EPA Reg. No. 83923-3

Material Sent for Data Extraction

Reg. # 83973-3

Description: Amend

☐ Material(s) Sent to Data Extraction Contractors:

- ☑ New Stamped Label Dated 1/14/14
- ☐ Notification Dated _____
- ☐ New CSF(s) Dated _____
- ☐ Other: _____

☐ Decision #: _____

☐ Other Action/Comments: _____

_____

File this coversheet and attached materials in the jacket. It must be well organized and clipped together, NOT STAPLED. Then give the jacket with the coversheet and materials to staff in the Information Services Center (ISC) (Room S-4900). If a jacket is full or only available as an image, please file materials in a new jacket and bring it down to the (ISC). For further information please call 703-605-0716.

Reviewer: Jennifer Urbanski

Phone: 347-0156 Division: RD

Date: 1/14/14

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

Ensystex III, Inc.
c/o Pyxis Regulatory Consulting, Inc.
4110 136th St., NW
Gig Harbor, WA 98332

Subject: Amended label to clarify exterior ant control DFU
Product Name: Prothor SC 0.5
EPA Reg. No. 83923-3
EPA Decision No. 483463
Submission dated September 27, 2013

JAN 1. 2014

Dear Ms. Pruett:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act is acceptable. A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one (1) copy of the final printed labeling before you release the product for shipment with the new labeling. See 40 CFR 156.10(a)(6).

Under 40 CFR 152.130(d), EPA may establish dates by which all product distributed or sold by the registrant must bear revised labeling. The following paragraphs set forth the schedule for ensuring that that your product bears revised labeling within a reasonable time period.

- Any product released for shipment after 2/28/14 must bear the new label.

If these conditions are not complied with, EPA will take appropriate action against this registration. If you have any questions please contact Dr. Jennifer Urbanski at 703-347-0156 or urbanski.jennifer@epa.gov.

Regards,

Venus Eagle, Product Manager (01)
Insecticide-Rodenticide Branch
Registration Division (7505P)

PROTHOR SC 0.5

For use only by individuals/firms licensed or registered by the state to apply termiticide products. States may have more restrictive requirements regarding qualifications of persons using this product. Consult the structural pest control regulatory agency of your state prior to use of this product.

For prevention or control of subterranean termites in and around residential, commercial, industrial, institutional and public structures and buildings.

Active Ingredient:	**By Wt.**
Imidacloprid	5.65%
Other Ingredients:	94.35%
TOTAL:	100.0%

Contains 0.5 pounds of imidacloprid per gallon

Shake well before using

EPA Reg. No. 83923-3 EPA Est. XXXXX-XX-XXX

STOP – Read the label before use

KEEP OUT OF REACH OF CHILDREN

CAUTION

(PRECAUCION AL USUARIO: Si usted no puede leer o entender ingles, no use este producto hasta que la etiqueta le haya sido explicada ampliamente.)

(TO THE USER: If you cannot read and understand English, do not use this product until the label has been fully explained to you.)

For product use information call 1-866-FOR-THOR (367-8467) or visit www.for-thor.com.

NET CONTENTS: _____ gal

Manufactured by:

ENSYSTEX IV, Inc.

2175 Village Drive, Fayetteville, NC 28304

ACCEPTED

JAN 14 2014

Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under:

EPA Reg. No: 83923-3

FIRST AID	
If swallowed	• Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by a poison control center or doctor. • Do not give anything by mouth to an unconscious person.
If on skin or clothing	• Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15 to 20 minutes. • Call a poison control center or doctor for treatment advice.
If in eyes	• Hold eye open and rise slowly and gently with water for 15 to 20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
HOTLINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-866-367-8467 for emergency medical treatment information.	
NOTE TO PHYSICIAN	
No specific antidote is available. Treat the patient symptomatically.	

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION

Harmful if swallowed, inhaled or absorbed through skin. Causes eye irritation. Avoid contact with skin, eyes or clothing. Avoid breathing dust or vapor. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing and wash before reuse. Keep children and pets away from treated area until dry.

Personal Protective Equipment: All pesticide handlers (mixers, loaders and applicators) must wear long-sleeved shirt and long pants, socks, shoes and chemical-resistant gloves made of waterproof material such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, polyethylene, polyvinyl chloride or viton. After the product is diluted in accordance with label directions for use, shirt, pants, socks and chemical-resistant gloves are sufficient protection. All pesticide handlers must wear protective eyewear, such as goggles, face shield or safety glasses, when working in a non-ventilated space or when applying as a termiticide by rodding or sub-slab injection.

Termite Control Treatment: When treating adjacent to an existing structure, the applicator must check the area to be treated and immediately adjacent areas of the structure for visible and accessible cracks and holes to prevent any leaks or significant exposures to persons occupying the structure. People present or residing in the structure during application must be advised to remove their pets and themselves from the structure if they see any signs of leakage. After application, the applicator is required to check for leaks. All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site. Do not allow people or pets to contact contaminated areas or to reoccupy contaminated areas of the structure until the cleanup is completed.

Environmental Hazards

This pesticide is highly toxic to aquatic invertebrates. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters. Apply this product only as specified on this label. Extreme care must be taken to avoid runoff. Apply only to soil or other fill substrate that will accept the solution at the specified rate. Do not treat soil that is water-saturated or frozen or in any conditions where run-off or movement from the treated area (site) is likely to occur. This product is highly toxic to bees exposed to direct treatment or residues

on blooming crops, plants or weeds. Do not apply this product or allow it to drift to blooming crops, plants or weeds if bees are foraging the treatment area.

Physical and Chemical Hazards

Do not apply this product or solutions of this product around electrical equipment, such as electrical conduits, motor housings, junction boxes, switch boxes, etc. due to the possibility of shock hazard.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Keep out of reach of children and animals. Store in original containers only. Store in a cool, dry place and avoid excess heat. Handle and open container in a manner so as to prevent spillage. Do not put concentrate or dilute material into food or drink containers. Preferably store in a locked area.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site (in the treatment area) or at an approved waste disposal facility.

Container Handling: Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container 1/4 full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

In Case of Spill: Confine it, avoid contact, isolate area and keep animals and unprotected persons away. If spill is liquid, form dike around spill area and/or absorb spill with absorbent materials, such as sand, cat litter or clay. If spill is dry powder only, sweep material into a suitable container. Place damaged package in a holding container and identify contents. Contact Ensystex IV at 1-866-367-8467 or Chemtrec at 1-800-424-9300 for any assistance.

APPLICATION FOR CONTROL OF SUBTERRANEAN TERMITES

Use Information

PROTHOR SC 0.5, in the form of a dilute insecticidal solution, prevents and controls subterranean termite infestations in and around structures and other items by creating a continuous chemically treated zone (horizontal and/or vertical as needed) between the wood and other cellulose material in a structure and termite colonies in the soil. In order to establish a zone between the wood in the structure and the termites in the soil, adequately disperse the solution of this product in the soil.

To effectively control subterranean termites with this product, the service technician should be familiar with current subterranean termite control practices including trenching, rodding, sub-slab and void injection, soil surface fan spraying and excavated soil treatment. Correct use of these techniques is necessary to effectively control infestations by subterranean termites such as *Coptotermes, Heterotermes and Reticulitermes.* The service technician should consider the biology and behavior of the termite specie(s) to be controlled to determine which control practices to use.

Treatment standards and procedures for subterranean termite control may vary due to regulations, water table level, structure design, soil types, construction practices and other factors. For advice concerning current control practices with respect to specific local conditions, consult resources in structural pest control and state cooperative extension and regulatory agencies. Follow all federal, state and local regulations and treatment standards for protection of a structure from subterranean termites.

Effective termite control may also include mechanical alteration of the structure. Elimination of leaks or points of moisture accumulation within or on the exterior of the structure that result in an increase in the moisture content of wooden structural components is advised. Removal of non-essential cellulose containing materials that are in contact with the ground under or around the structure can reduce termite foraging in the area.

PROTHOR SC 0.5 is labeled for use against subterranean termites as a 0.05% to 0.10% solution in water. Generally, the 0.05% rate is used for typical control situations. When severe or persistent infestations are occurring, a 0.10% solution may be more appropriate. When difficult or problem soils or construction types are encountered, it may be necessary to use 0.10% PROTHOR SC 0.5 mixed in reduced volumes of water.

Avoid contamination of water supplies due to backflow under reduced water system pressure by using anti-backflow equipment or procedures to prevent siphoning of any solution back into a water supply. Do not contaminate cisterns or wells. Do not treat soil that is water saturated or frozen. Do not treat while precipitation is occurring. Do not apply solution to an area or site if the soil at the area or site is in such a state or condition that runoff or movement of the solution from the treated area or site is likely to occur. Structures that contain wells or cisterns within the foundation of the structure can only be treated using the treated backfill method described in the treatment around wells and cisterns section of this label. Consult state and local specifications for recommended distances of wells from treated areas, or if such regulations do not exist, refer to Federal Housing Administration Specifications (H.U.D.) for guidance.

Dilution and Mixing of PROTHOR SC 0.5

Use rates for PROTHOR SC 0.5 are expressed and the solution is mixed according to the percentage (%) concentration it forms when mixed in water. Use the *Mixing Table for PROTHOR SC 0.5* or alternately the formulas below to determine the amount of PROTHOR SC 0.5 to add to any quantity of water.

To mix, measure out the required amount of PROTHOR SC 0.5 according to the *Mixing Table for PROTHOR SC 0.5.* Pour this amount of PROTHOR SC 0.5 into the spray tank as it is being filled with water with the agitator operating.

Mix PROTHOR SC 0.5 to create a use dilution in the following manner:

1. Fill tank 1/4 to 1/3 full.
2. Start pump to begin by-pass agitation and place end of treating tool in tank to allow circulation through hose.
3. Add appropriate amount of PROTHOR SC 0.5.
4. Add remaining amount of water.
5. Let pump run and allow recirculation through the hose for 2 to 3 minutes."

Prothor SC may also be mixed into full tanks of water, but substantial agitation is required to ensure uniformity of the solution.

Mixing Table for PROTHOR SC 0.5

Solution Percentage Concentration Desired	Gallons of Finished Solution Desired	Fluid Ounces of PROTHOR SC 0.5 to add
0.05%	25	27.5
	50	55.0
	100	110.0
0.10%	25	55.0
	50	110.0
	100	220.0

Calculating an Amount of PROTHOR SC 0.5 to Mix

To mix any amount of PROTHOR SC 0.5 determine:

A = Gallons of water into which PROTHOR SC 0.5 will be mixed. Express any partial gallons as decimal fractions (1/2 = .5).

Fluid ounces of PROTHOR SC 0.5 to add to A gallons for 0.05% = A x 1.1

Fluid ounces of PROTHOR SC 0.5 to add to A gallons for 0.10% = A x 2.2

Proportional Injector Mixing Table For PROTHOR SC 0.5

Solution Percentage Concentration Desired	Injector Volume (fluid ounces per gallon)
0.05%	1.10
0.10%	2.20

Application Volume

To provide maximum control and protection against termite infestation, apply the specified volume of the finished water solution containing the specified amount of PROTHOR SC 0.5 as set out below or as otherwise directed in this label.

Prescribed Horizontal Barrier Rate: Unless otherwise directed, horizontal barriers are created by applying a 0.05% to 0.10% solution at a rate of one gallon of solution per 10 square feet.

Prescribed Vertical Barrier Rate: Unless otherwise directed, vertical barriers are created by applying a 0.05% to 0.10% solution at a rate of four gallons of solution per 10 linear feet per foot of depth.

Adjustments to Application Volume

If soil will not accept the labeled application volumes, the volume may be reduced provided there is a corresponding increase in concentration so that the amount of active ingredient applied to the soil remains the same.

Large reductions of application volume reduce the likelihood of obtaining a continuous barrier. Variance is allowed when volume and concentration are consistent with label directed rates and a continuous barrier can still be achieved. When volume is reduced, the spacing of holes created for sub slab injection and soil rodding may need to be reduced to account for decreased dispersion of the solution in the soil.

For example, adjust the amount of solution applied to deliver a horizontal barrier of 10 square feet from 1 gallon to as low as 0.5 gallons and as high as 2 gallons while maintaining the amount of PROTHOR SC 0.5 applied per 10 square feet.

For example, adjust the amount of solution applied to deliver a vertical barrier 10 feet long by one foot deep from 4 gallons to as low as 2 gallons and as high as 8 gallons while maintaining the amount of PROTHOR SC 0.5 applied per 10 linear feet.

PRE-CONSTRUCTION TREATMENT

All Structures

Do not apply at a lower dosage and/or concentration than specified on this label for applications prior to the installation of the finished grade.

Prior to each application, applicators must notify the general contractor, construction superintendent, or similar responsible party, of the intended termiticide application and intended sites of application and instruct the responsible person to notify construction workers and other individuals to leave the area to be treated during application and until the termiticide is absorbed into the soil.

Concrete Slab On Ground or Basements

Apply an overall treatment to the entire surface of soil or other substrate to be covered by the slab including areas to be under carports, porches, basement floors and entrance platforms. Apply solution uniformly at the Prescribed Horizontal Barrier Rate. If fill under slab is gravel or other coarse aggregate, apply at the rate of 1.5 gallons per 10 square feet or sufficient volume of solution to uniformly cover each 10 square feet. To provide a uniform treated zone in soil at critical areas such as along the inside of foundation walls, and around plumbing, bath traps, utility services, and other features that will penetrate the slab, apply solution at the Prescribed Vertical Barrier Rate to these areas.

After completion of grading, make an application by trenching or trenching and rodding around the slab or foundation perimeter and applying solution at the Prescribed Vertical Barrier Rate. Rodding may be done from the bottom of a shallow trench. When rodding, rod holes must be spaced in a manner that will allow for a continuous chemical treated zone to be deposited along the treated area (place holes 12 or fewer inches apart). Rod holes should not extend below the footing. When trenching, the trench along the outside foundation should be about 6 inches in width and 6 inches in depth. Use a low pressure spray (not to exceed 25 PSI at the treatment tool when the valve is open) to treat the soil which will be placed into the trench after rodding. Mix the spray solution with soil as it is being placed in the trench. When treating voids in hollow masonry units, apply 2 gallons of solution per 10 linear feet of wall. Apply solution so it will reach the footing by injecting into the lower areas of the wall, just above the floor or footing.

When treating foundations deeper than 4 feet, apply the termiticide as the backfill is being replaced, or if the construction contractor fails to notify the applicator to permit this, treat the foundation to a minimum depth of 4 feet after the backfill has been installed. The applicator must trench and rod into the trench or trench along the foundation walls and around pillars and other foundation elements and treat the soil at the Prescribed Vertical Barrier Rate from grade to a minimum depth of 4 feet. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. However, in no case should a structure be treated below the footing. Rodding in trench followed by flooding of trench and treatment of backfill may provide a better chance of achieving a continuous treated zone than using soil rodding alone to establish a vertical treated zone.

Crawl Spaces

Application must be made by trenching or trenching and rodding downward along the inside and outside of foundation walls, around piers, interior supports in contact with the soil, plumbing, and utility services at the Prescribed Vertical Barrier Rate. Rodding may be done from the bottom of a shallow trench to the top of the footing or a minimum of 4 feet. When rodding, rod holes must be spaced in a manner that will allow for a continuous treated zone to be deposited along the treated area. Rod holes should not extend below the footing. When trenching, the trench should be about 6 inches wide and 6 inches deep. Use a low pressure spray to treat soil which will be placed in the trench, mixing the spray solution with soil as it is being placed in the trench.

Hollow Block Foundations and Voids

Hollow block foundations or voids in masonry resting on the footing may be treated to create a continuously treated zone in the voids at the footing. Apply 2 gallons of solution per 10 linear feet to the lower part of the void so that it reaches the top of the footing or soil. Treatment of voids in block or rubble foundation walls must be closely examined. Applicators must inspect areas of possible runoff as a precaution against application leakage in the treated areas. Some areas may not be treatable or may require mechanical alteration prior to treatment. All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site (refer to Precautionary Statements). Do not allow people or pets to contact or to reoccupy the contaminated areas of the structure until the clean up is completed.

POST CONSTRUCTION TREATMENT

All Structures

Do not apply treatment until the identity and location of all wells, radiant heat pipes, water and sewer lines, electrical conduits and sub-slab heating and air conditioning ducts is established. Caution must be taken to avoid puncturing these elements and/or injecting solution into them. All holes in commonly occupied areas into which material has been applied must be plugged. Plugs must be of a non-cellulose material or covered by an impervious, non-cellulose material.

Vertical Barrier Depth: For applications made after the final grade is installed, the applicator must trench and rod into the trench or trench along the foundation walls and around pillars and other foundation elements and treat at the rate prescribed from grade to the top of the footing. When the footing is more than four (4) feet below grade, the applicator must trench and rod into the trench or trench along the foundation walls and treat at the rate prescribed to a minimum depth of four feet. The actual depth of treatment will vary depending on the soil type, degree of compaction, and location of termite activity. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. However, in no case should a structure be treated below the footing.

Structures Containing Concrete Slabs on Ground (Monolithic/Floating/Supported) including Basements

To make an application beneath existing slabs, it may be necessary to drill holes in the slab or adjacent foundation and to apply solution. Holes should be spaced such that when treatment is applied through them, a continuous treated zone is applied beneath the slab.

Treat all existing cracks and cold, construction or expansion joints. Also, treat around bath traps, plumbing and utility services which penetrate the slab. Apply 4 gallons per 10 lineal feet per foot of depth to provide a uniform treated zone.

Vertical Barriers Along Exterior of Foundation Walls: Trench and rod into the trench or trench along the outside of foundation walls and treat at the Prescribed Vertical Barrier Rate to the depth specified under Vertical Barrier Depth. Where physical obstructions such as concrete walkways adjacent to foundation elements or soil type and/or conditions make trenching prohibitive, treatment may be made by rodding alone.

Vertical Barriers Along Interior of Foundation Walls: Vertical barriers may be established on the interior side of foundation walls by sub-slab injection of the solution at the Prescribed Vertical Barrier Rate. Injection openings can be drilled either vertically through the slab along the interior of the foundation wall or horizontally from the exterior through the foundation wall low enough on the wall to allow for the deposition of the solution beneath the slab along the interior side of the foundation wall. Drill holes should be spaced so as to achieve a continuous chemical barrier but in no case farther apart than 12 inches. Special care must be taken to distribute the solution evenly. Vertical barriers may also be established beneath the slab along both sides of interior footing-supported

walls, one side of interior partitions and along all cracks and expansion joints and utility service entrances and bath traps.

Horizontal Barriers Beneath Slabs on Ground: Create a horizontal barrier by treating at the Prescribed Horizontal Barrier Rate beneath slabs by either drilling and long rodding from the exterior or by grid pattern drilling and injection vertically through the slab. Long rodding should be used only when grid pattern drilling and injection and horizontal short rodding and injection cannot be used to deliver the sub slab treatment.

Bath Traps: Exposed soil beneath and around areas where plumbing and utility services penetrate the slab should be treated at the rate of 3 gallons of solution per square foot of soil.

Structures Containing Accessible Crawl Spaces

For crawl spaces, including sealed underfloor spaces that serve as heating and air conditioning plenums, apply vertical termiticide barriers at the rate of 4 gallons of solution per 10 linear feet per foot of depth from grade to the top of the footing, or if the footing is more than 4 feet below grade, to a minimum depth of 4 feet. Apply by trenching and rodding into the trench, or trenching. Treat both sides of foundation and around all piers and pipes. Where physical obstructions such as concrete walkways adjacent to foundation elements prevent trenching, treatment may be made by rodding alone. When soil type and/or conditions make trenching prohibitive, rodding may be used. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. Read and follow the mixing and use direction section of the label if situations are encountered where the soil will not accept the full application volume.

1. Rod holes and trenches must not extend below the bottom of the footing.

2. Rod holes must be spaced so as to achieve a continuous termiticide barrier but in no case more than 12 inches apart.

3. Trenches must be a minimum of 6 inches deep or to the bottom of the footing, whichever is less, and need not be wider than 6 inches. When trenching in sloping (tiered) soil, the trench must be stepped to ensure adequate distribution and to prevent termiticide from running off. The solution must be mixed with the soil as it is replaced in the trench.

4. When treating crawl spaces used as plenums, turn off the air circulation system of the structure until application has been completed and all solution has been absorbed by the soil.

Subterranean termites can be prevented from constructing shelter tubes directly between the crawl space soil surface and overhead crawl space wooden members by the application of an overall treatment of the crawl space soil surface at the Prescribed Horizontal Barrier Rate using a 0.05% to 0.10% solution of PROTHOR SC 0.5.

PROTHOR SC 0.5 can be applied as a general fan spray within crawl spaces directly to swarming and exposed worker termites at the Prescribed Horizontal Barrier Rate using a 0.05% to 0.10% solution of PROTHOR SC 0.5.

Overall treatments (treatments where chemical is applied more than 18 inches from the foundation walls, piers and pipes) should not be applied within a crawl space that serves as a plenum.

Structures Containing Inaccessible Crawl Spaces

For inaccessible interior areas, such as areas where there is insufficient clearance between floor joists and ground surfaces to allow operator access, excavate, if possible, and treat according to the instructions for accessible crawl spaces. Otherwise, apply one, or a combination of the following two methods.

1. To establish a horizontal barrier, apply to the soil surface, 1 gallon of solution per 10 square feet overall using a nozzle pressure of less than 25 p.s.i. and a coarse application nozzle (e.g., Delavan Type RD Raindrop, RD-7 or larger, or Spraying Systems Co. 8010LP TeeJet or comparable nozzle). For an area that cannot be reached with the application wand, use one or more extension rods to make the application to the soil. Do not broadcast or power spray with higher pressures.

2. To establish a horizontal barrier, drill through the foundation wall or through the floor above and treat the soil perimeter at a rate of 1 gallon of solution per 10 square feet. Drill spacing must be at intervals not to exceed 16 inches. Many states have smaller intervals, so check state regulations which may apply.

When treating crawl spaces used as plenums, turn off the air circulation system of the structure until application has been completed and all termiticide has been absorbed by the soil.

Overall treatments (treatments where chemical is applied more than 18 inches from the foundation walls, piers and pipes) should not be applied within a crawl space that serves as a plenum.

Masonry Voids

Drill and treat voids in multiple masonry elements of the structure extending from the structure to the soil in order to create a continuous treatment barrier in the area to be treated. Apply at the rate of 2 gallons of solution per 10 linear feet of footing using a nozzle pressure of less than 25 p.s.i. When using this treatment access holes must be drilled below the sill plate and should be as close as possible to the footing as is practical. Treatment of voids in block or rubble foundation walls must be closely examined: Applicators must inspect areas of possible runoff as a precaution against application leakage in the treated areas. Some areas may not be treatable or may require mechanical alteration prior to treatment.

All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site. Do not allow people or pets to contact contaminated areas or to reoccupy the contaminated areas of the structure until the clean-up is completed.

When drilling veneer walls, care should be taken to not drill beyond the depth of the void behind the veneer into another construction layer behind the veneer. It is however permissible to drill through the veneer and into concrete blocks behind the veneer and to treat the veneer and the concrete blocks at the same time.

Not for use in voids insulated with rigid foam.

TREATMENT OF STRUCTURES WITH WELLS AND CISTERNS

Do not contaminate wells or cisterns.

Structures with Wells/Cisterns Inside Foundations

Structures that contain wells or cisterns within the foundation of a structure can only be treated using the following techniques:

Do not treat soil while it is beneath or within the foundation or along the exterior perimeter of a structure that contains a well or cistern. The treated backfill method must be used if soil is removed and treated outside/away from the foundation. The treated backfill technique is described as follows:

a. Trench and remove soil to be treated onto heavy plastic sheeting or similar material or into a wheelbarrow.

b. Treat the soil at the rate of 4 gallons of dilute solution per 10 linear feet per foot of depth of the trench, or 1 gallon per 1.0 cubic feet of soil. See *Mixing Directions for PROTHOR SC 0.5 for Use as a Termiticide* section of the label. Mix thoroughly into the soil taking care to contain the liquid and prevent runoff or spillage.

c. After the treated soil has absorbed the solution, replace the soil into the trench.

Structures with Adjacent Wells/Cisterns and/or Other Water Bodies

Applicators must inspect all structures with nearby water sources such as wells, cisterns, surface ponds, streams, and other bodies of water and evaluate, at a minimum, the treatment recommendations listed below prior to making an application.

1. Prior to treatment, if feasible, expose the water pipe(s) coming from a well to the structure, if the pipe(s) enter the structure within 3 feet of grade.

2. Prior to treatment, applicators are advised to take precautions to limit the risk of applying the termiticide into subsurface drains that could empty into any bodies of water. These precautions include evaluating whether application of the termiticide to the top of the footer may result in contamination of the subsurface drain. Factors such as depth to the drain system and soil type and degree of compaction should be taken into account in determining the depth of treatment.

3. When appropriate (for example, on the water side of the structure), the treated backfill technique (described above) can also be used to minimize offsite movement of termiticide.

FOAM APPLICATION

PROTHOR SC 0.5, in the form of a foam, can be used to deliver PROTHOR SC 0.5 as a termiticide any time it appears likely this form of delivery will improve the dispersal of PROTHOR SC 0.5 into and within the intended target area. Construction practices, soil subsidence and other factors may create situations in which a continuous treated zone cannot be achieved using conventional treatment alone. In these situations or wherever else it becomes necessary, conventional application methods can be supplemented through the use of foam (created by the use of foam generating equipment, or similar devices) to create a continuous treated zone. Foam can be particularly useful to deliver PROTHOR SC 0.5 where it either cannot be depended upon to be delivered as just a solution or due

to a need to reduce the amount of water used in order to avoid water damage to the target or adjacent areas.

Depending on the circumstances, foam applications of PROTHOR SC 0.5 may be used alone or in combination with liquid solution applications, provided that the cumulative amount of active ingredient applied per unit of area is equivalent to that which would be applied according to a solution-only application at the recommended rate. At least 75% of the gallons of PROTHOR SC 0.5 must be applied as a typical liquid treatment. The remaining 25% or less gallons can be delivered to appropriate locations using a foam application. The application of the correct volume and amount of active ingredient are essential to the application of an effective treatment.

Foam Mixing Instructions

27.5 ounces of PROTHOR SC 0.5 can be mixed with between 1 and 5 gallons of water and expanded to create 25 gallons of foam containing 0.05% active ingredient. 55.0 ounces of PROTHOR SC 0.5 can be mixed with between 1 and 5 gallons of water and expanded to create 50 gallons of foam containing 0.05% active ingredient. See the Foam Mixing and Expansion Table below for foam mixing and expansion ratios.

Foam Mixing and Expansion Table (all mixes produce 0.05% active ingredient foam)

Gallons of Foam Desired	Gallons of Water*	Amt. of PROTHOR SC 0.5 to Add to Water	Expansion Ratios
25	1.0	27.5 ounces	25:1
25	2.5	27.5 ounces	10:1
25	5.0	27.5 ounces	5.:1
50	1.0	55.0 ounces	50:1
50	2.5	55.0 ounces	20:1
50	5.0	55.0 ounces	10:1

*Add the foaming agent manufacturer's recommended amount of foaming agent to solution after water and PROTHOR SC 0.5 are mixed. Verify that the foaming agent is compatible with PROTHOR SC 0.5 before mixing or using with PROTHOR SC 0.5.

Foam Application Use Directions

Using foam generating equipment, a solution of PROTHOR SC 0.5 (see Foam Mixing Instructions) may be converted into a predetermined amount foam according to the foaming agent and foaming equipment manufacturer's recommendations. Verify that the foaming agent is compatible with PROTHOR SC 0.5.

First, form a solution of PROTHOR SC 0.5 of the appropriate percentage concentration and volume (see Foam Mixing Instructions). Then add to the solution the recommended volume of foaming agent according to the foaming agent manufacturer's directions.

Foam applications may be made behind veneers, piers, chimney bases, into rubble foundations, into block voids, structural voids or other similar voids, under slabs, stoops, porches or to the soil in crawlspaces. Use dispersion tips and application methods appropriate to the site. Always apply a sufficient volume of PROTHOR SC 0.5 in the form of a foam alone or in combination with a liquid solution to provide a continuous treated zone at the recommended rate for specific application sites.

RETREATMENT

Retreatments for subterranean termites can only be performed if there is clear evidence of reinfestation or disruption of the barrier due to construction, excavation or landscaping and/or evidence of the breakdown of the termiticide barrier in the soil. These vulnerable or reinfested areas may be retreated in accordance with application techniques described in this product's labeling. The timing and type of these retreatments will vary, depending on factors such as termite pressure, soil types, soil conditions and other factors which may reduce the effectiveness of the barrier. Retreatment may be made as either a spot or complete treatment.

Retreatments in the absence of reinfestation or barrier disruption may be performed five or more years after a complete treatment was last applied to the structure. Such retreatments should be made based on the judgment of the applicator that such retreatment is necessary to ensure the continued protection of the structure from termite attack. In making such judgment, the applicator should take into account the expected useful life of the last treatment administered (based on efficacy testing) and conditions specific to the structure in question that may increase it vulnerability to attack.

Annual retreatment of the structure is prohibited unless there is clear evidence that reinfestation or treated zone disruption has occurred.

APPLICATION IN CONJUNCTION WITH BORATES AND TERMITE BAITS

Spot only applications of PROTHOR SC 0.5 can be used as a supplement to borate treatments and termite baiting system installations that are labeled for stand alone protection against termite attack. Stand alone product is defined as a product that is labeled for the protection of a structure when applied alone without the use of other termite control products. Spot only applications are defined as the use of PROTHOR SC 0.5 according to any of the permitted and applicable post-treatment application techniques contained in this label, alone or in combination, to the extent needed or deemed necessary or useful as an adjunct to the application of a standalone product.

APPLICATION TO PROTECT UNDERGROUND ITEMS FROM SUBTERRANEAN TERMITE ATTACK

To protect components installed underground such as wires, conduits, cables and pipes buried in soil against termite attack, create an envelope of PROTHOR SC 0.5 treated soil around the components along the entire underground length of the component. First, treat soil through which components will be run with 0.05% to 0.10% solution of PROTHOR SC 0.5 at a rate of 2 gallons of solution per 10 linear feet. Install components, laying them on the treated soil. Cover components with untreated soil and then treat this covering soil using the same percent solution at 2 gallons of solution per 10 linear feet.

Underground components to be protected may be located within the foundation of a structure or outside of a structure such as within a utility right of way, for example. Do not treat items that are electrically energized at the time of application. If the soil will not absorb the indicated amount of solution, as little as 1 gallon of 0.10% solution per 10 linear feet can be used. Treat points where services emerge from the ground at a rate of 1 to 2 gallons of solution at the point of emergence.

APPLICATIONS TO PROTECT POLES, POSTS AND OTHER WOODEN ITEMS FROM SUBTERRANEAN TERMITE ATTACK

PROTHOR SC 0.5 can be used to protect the below ground portions of wooden structural components from termites. Form a treated zone around components below ground by vertically rodding the soil around their perimeter to a depth of six inches below their maximum depth of placement in the soil and applying a 0.05% to 0.10% solution of PROTHOR SC 0.5 at a rate of 0.4 gallons of solution per linear foot of perimeter around the component per foot of treated depth. Measure the perimeter of the component six inches from the outside of the component.

APPLICATIONS TO TERMITE CARTON NESTS LOCATED IN ABOVE GROUND WALL VOIDS

Apply a 0.05% to 0.10% solution of PROTHOR SC 0.5 directly into above ground termite carton nests including nests located in wall voids using a directional injector. Apply as a solution or foam under pressure to distribute solution thoroughly throughout the nest. It may be necessary to inject solution at one or more points and at varying depths within the nest to adequately distribute solution within the interior of the nest.

EXTERIOR APPLICATION FOR ANT CONTROL

Apply a 0.05% to 0.10% solution of PROTHOR SC 0.5 to the exterior of the structure as a general surface, spot, crack and crevice or wall void treatment. Apply at points where ants may enter the structure or crawl and hide including exterior surfaces, around doors and windows, under eaves, attic and foundation vents, utility entrances and cracks in the surface of the structure. Spray solution or foam into voids where ants or their nests are present. Apply a volume of solution sufficient to cover the target surface(s) however avoid excess dripping or runoff from vertical or overhead surfaces.

Treat soil, turf or ground cover (flower, shrub and plant beds) adjacent to the structure where ants are trailing or may find food. Ants tunneling in the soil may be controlled by applying a 0.05% to 0.10% solution of PROTHOR SC 0.5 as a drench or soil injection along the edge of foundations or other hard surfaces such as driveways. Apply in a volume sufficient to treat or cover the soil or foliage.

Inject a 0.05% to 0.10% solution of PROTHOR SC 0.5 in the form of a spray or foam into tree cavities or other parts of trees where ant nests are located.

It is recommended to remove or prune away shrubbery, bushes and tree branches touching the structure. Vegetation touching the structure may offer a route of entry for ants into the structure that allow ants to inhabit the

structure without coming in contact with the treatment. If nests are found, direct treatment of nests with PROTHOR SC 0.5 can be made.

Do not use PROTHOR SC 0.5 against native fire ants, imported fire ants, pharaoh ants or harvester ants. Limit applications for control of carpenter ants to treatment of non-wooden parts or surfaces of structures.

Exterior Application Restrictions

Do not treat more often than once per month. Do not allow residents or pets into the immediate area during application or allow them to make contact with treated areas until spray has dried.

Do not allow this product to contact plants in bloom while bees are foraging the treatment area.

Do not apply to soil in areas where edible plants may be planted. Do not plant edible plants in soil that has been treated with PROTHOR SC 0.5.

IMPORTANT READ BEFORE USE

NOTICE: Read the entire Directions for Use, Conditions of Sale, Disclaimer of Warranties and Limitations of Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

CONDITIONS OF SALE: The Directions for Use of this product are believed to be adequate and must be followed carefully. However, because of manner of use and other factors beyond the control of Ensystex IV, Inc., it is impossible for Ensystex IV to eliminate all risks associated with the use of this product such as ineffectiveness or unintended consequences. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold Ensystex IV harmless for any claims relating to such factors.

DISCLAIMER OF WARRANTIES: To the extent consistent with applicable law, seller warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the Directions for Use when used in accordance with the Directions for Use under normal conditions of use. ENSYSTEX IV MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE, NOR ANY OTHER EXPRESS OR IMPLIED WARRANTIES WITH RESPECT TO THE SELECTION, PURCHASE, OR USE OF THIS PRODUCT THAT EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. Any warranties, express or implied, having been made are inapplicable if this product has been used contrary to label instructions, under abnormal conditions or under conditions not reasonably foreseeable by (or beyond the control of) seller or Ensystex IV, Inc., and buyer assumes the risk of any such use.

LIMITATIONS OF LIABILITY: To the extent consistent with applicable law, Ensystex IV shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF ENSYSTEX IV AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ENSYSTEX IV, THE REPLACEMENT OF THE PRODUCT.

This Conditions of Sale and Limitation of Warranty and Liability may not be amended by any oral or written agreement.

PROTHOR is a registered trademark of Ensystex IV, Inc.

EPA [*approval date*]

Urbanski, Jennifer

From: Leanne Pruett [Leanne@PyxisRC.com]
Sent: Wednesday, January 08, 2014 12:54 PM
To: Urbanski, Jennifer
Subject: RE: 83923-3
Attachments: 083923-00003.20140108.Prothor SC 0.5 bee protection language with EPA updates.pdf

Hi, Jenn –

Here's the Prothor SC 0.5.

Best,
Leanne

From: Urbanski, Jennifer [mailto:urbanski.jennifer@epa.gov]
Sent: Monday, December 30, 2013 1:33 PM
To: Leanne Pruett
Subject: 83923-3

Hi Leanne, comments attached, thanks!

Jennifer Urbanski, Ph.D., Biologist
Insecticide-Rodenticide Branch, S7221
Registration Division (7505P)
U.S. Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460
(703) 347-0156

Please read instructions on reverse before completing form. Form Approved. OMB No. 2070-0060. Approval expires 2-28-95

EPA

United States
Environmental Protection Agency
Washington, DC 20460

- [ ] Registration
- [X] Amendment
- [ ] Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number	2. EPA Product Manager	3. Proposed Classification
Ensystex IV, Inc / 83923-3	V. Eagle	[X] None [ ] Restricted
4. Company/Product (Name)	**PM#**	
Ensystex IV, Inc. / Prothor SC 0.5	1	

5. Name and Address of Applicant *(Include ZIP Code)*

Ensystex III, Inc.
c/o Pyxis Regulatory Consulting, Inc.
4110 136th St., NW, Gig Harbor, WA 98332

[ ] *Check if this is a new address*

6. Expedited Reveiw. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to:

EPA Reg. No. _____

Product Name _____

Section - II

- [X] Amendment - Explain below.
- [ ] Resubmission in response to Agency letter dated _____
- [ ] Notification - Explain below.
- [ ] Final printed labels in reponse to Agency letter dated _____
- [ ] "Me Too" Application.
- [ ] Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

This is a fast track amendment to incorporate the new pollinator protective language.

Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging	Unit Packaging	Water Soluble Packaging	2. Type of Container
[ ] Yes [ ] No	[ ] Yes [ ] No	[ ] Yes [ ] No	[ ] Metal [ ] Plastic [ ] Glass [ ] Paper [ ] Other (Specify) _____
* *Certification must be submitted*	If "Yes" Unit Packaging wgt. / No. per container	If "Yes" Package wgt / No. per container	

3. Location of Net Contents Information	4. Size(s) Retail Container	5. Location of Label Directions
[ ] Label [ ] Container		[ ] On Label [ ] On Labeling accompanying product

6. Manner in Which Label is Affixed to Product [ ] Lithograph [ ] Paper glued [ ] Stenciled [ ] Other _____

Section - IV

1. Contact Point *(Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)*

Name	Title	Telephone No. (Include Area Code)
P. Leanne Pruett	Agent	253-853-7369

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowlingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

6. Date Application Received (Stamped)

2. Signature	3. Title
P. Leanne Pruett	Agent
4. Typed Name	**5. Date**
P. Leanne Pruett	September 27, 2013

EPA Form 8570-1 (Rev. 3-94) Previous editions are obsolete. White - EPA File Copy (original) Yellow - Applicant Copy

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

September 27, 2013

Venus Eagle (PM1)
Document Processing Desk (AMEND)
Office of Pesticide Programs (7505P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202-4501
ATTENTION: Pollinator Fast-Track Amendment

RE: Ensystex IV, Inc. – submission of label amendment to Imidacloprid products to add pollinator protection language, including the following products:

- Bithor SC GC (EPA Reg. No. 83923-1)
- Bithor SC (EPA Reg. No. 83923-2)
- Prothor SC 0.5 (EPA Reg. No. 83923-3)
- Prothor SC 2 (EPA Reg. No. 83923-4)
- Turfthor 2F (EPA Reg. No. 83923-5)

Dear Ms. Eagle,

On behalf of Ensystex IV, Inc., I am submitting a series of applications to amend the registrations of the above-listed subject products, to add pollinator protection language to the product labels. The language is being added in response to Steven Bradbury's August 15th, 2013 letter regarding Pollinator Protection Labeling for Nitroguanidine Neonicotinoid Products.

In support of these label amendments, the following documents are enclosed for each product:

1. EPA Application Form 8570-1
2. One (1) copy of product label with changes tracked
3. Three (3) copies of product label with changes incorporated
4. One copy of the proposed label on CD
5. Certification with respect to Label Integrity

Additionally, I have enclosed a letter of authorization, allowing Pyxis to act as Ensystex's agent with EPA.

As per Steven Bradbury' August 15, 2013 letter, these amendments qualify as non-PRIA fast track amendments. Please note we are not including amendments for Turfthor 2.5G or 0.5G (EPA Reg. No's 83923-9 and 83923-10), as they are granular products, and these updates are not required for granulars. If you have any questions or concerns regarding these amendment applicationsen, or require additional information, please contact me at (253) 853-7369 or Leanne@PyxisRC.com.

Best Regards,

P. Leanne Pruett
Pyxis Regulatory Consulting

Enclosures
cc: Ensystex IV, Inc.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

October 25, 2013

OFFICE OF CHEMICAL
SAFETY
AND POLLUTION
PREVENTION

JANELLE KAY
PYXIS REGULATORY CONSULTING, INC.
ENSYSTEX IV, INC
4110 136TH STREET
GIG HARBOR, WA 98332-

PRODUCT NAME: PROTHOR SC 0.5
COMPANY NAME: ENSYSTEX IV, INC
OPP IDENTIFICATION NUMBER:
EPA FILE SYMBOL: 83923-3
EPA RECEIPT DATE: 10/23/13

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Registration Division, Risk Management Team 1, at (703) 308-8045.

Sincerely,

Front End Processing Staff
Information Services Branch
Information Technology & Resources Management Division

Fee for Service {942452ä~

This package includes the following

- ○ New Registration
- ◉ Amendment

☐ Studies? ☐ Fee Waiver?

☐ volpay % Reduction: ___

for Division

- ○ AD
- ○ BPPD
- ◉ RD

Risk Mgr. 1

Receipt No. S-	942452
EPA File Symbol/Reg. No.	83923-3
Pin-Punch Date:	10/23/2013

☑ This item is NOT subject to FFS action.

Action Code:

Requested: ____

Granted: ____

Amount Due: $ _____

Parent/Child Decisions:

☐ Inert Cleared for Intended Use ☐ Uncleared Inert in Product

Reviewer: _____ Date: 10-25-13

Remarks:

Material Sent for Data Extraction

Reg. # 83923-3

Description: Alternate CSFs #1 and #2

☒ Material(s) Sent to Data Extraction Contractors:

- ☐ New Stamped Label Dated _____
- ☐ Notification Dated _____
- ☒ New CSFs Dated 3/12/13
- ☐ Other: _____

☐ Decision #: 476426

☐ Other Action/Comments: _____

File this coversheet and attached materials in the jacket. It must be well organized and clipped together, NOT STAPLED. Then give the jacket with the coversheet and materials to staff in the Information Services Center (ISC) (Room S-4900). If a jacket is full or only available as an image, please file materials in a new jacket and bring it down to the (ISC). For further information please call 703-605-0716.

Reviewer: Julie A. Chao

Phone: 308-8735 Division: RD/IRB

Date: May 21, 2013

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

May 21, 2013

Ensystex IV, Inc.
c/o Mr. Michael Kellogg
Pyxis Regulatory Consulting, Inc.
4110 136th St. NW
Gig Harbor, WA 98332

Subject: Alternate Confidential Statements of Formulation #1 and #2
Product Name: Prothor SC 0.5
EPA Reg. No.: 83923-3
EPA Decision No.: 476426
Your submission dated March 12, 2013

Dear Mr. Kellogg,

The CSFs referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, are acceptable. Please note that the record for this product currently contains the CSFs listed below. Any previously dated CSFs are superseded.

- Basic CSF, dated August 9, 2012
- Alternate CSF #1, dated March 12, 2013
- Alternate CSF #2, dated March 12, 2013

If you have any questions, please contact Julie Chao by phone at: (703) 308-8735, or by email at: chao.julie@epa.gov.

Sincerely,

Venus Eagle, Product Manager 01
Insecticide-Rodenticide Branch
Registration Division (7505P)

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

CONTAINS CONFIDENTIAL BUSINESS INFORMATION

March 12, 2013

COURIER DELIVERY

Venus Eagle (PM 1)
Document Processing Desk (**AMEND**)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202-4501

RE: Ensystex IV, Inc. – Prothor SC 0.5 (EPA Reg. No. 83923-3)
Response to Agency Letter dated October 17, 2012 – Submission of Alternate Confidential Statements of Formula (CSF's)

Dear Ms. Eagle,

On behalf of Ensystex IV, Inc. and in response to the Agency letter dated October 17, 2012 please find the enclosed revised Alternate Formulation CSF's labeled Alternate Formulation #1 and Alternate Formulation #2 dated March 12, 2013.

[redacted]

In support of this amendment, we submit the following documents:

1. Copy of the cover letter with Confidential Business Information redacted
2. Completed Application for Amendment (EPA Form 8570-1)
3. One (1) copy of the Agency letter dated October 17, 2012
4. Two (2) copies of the Confidential Statements of Formula (Alternate Formulation #1 and Alternate Formulation #2 dated March 12, 2013)
5. MSDS sheet for the alternate inert ingredient being added referenced above

The Alternate formulations submitted with this amendment application are in **ADDITION** to the previously approved Basic formulation dated August 9, 2012 for Prothor SC 0.5.

As no data are being submitted with this amendment, nor will data need to be reviewed to approve the proposed amendment, Ensystex believes this action qualifies as a Fast Track amendment and is not subject to a Pesticide Registration Service Fee. Please feel free to call me if you have any questions or need any additional information.

Sincerely,

Michael Kellogg

Enclosures
cc: D. Nimocks; Ensystex IV, Inc.

Inert ingredient information may be entitled to confidential treatment

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

CONFIDENTIAL BUSINESS INFORMATION REDACTED

March 12, 2013

COURIER DELIVERY

Venus Eagle (PM 1)
Document Processing Desk (**AMEND**)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202-4501

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Sincerely,

Michael Kellogg

Enclosures
cc: D. Nimocks; Ensystex IV, Inc.

Please read instructions on reverse before completing form. Form Approved. OMB No. 2070-0060, Approval expires 2-28-95

EPA United States Environmental Protection Agency Washington, DC 20460

☐ Registration ☑ Amendment ☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number	2. EPA Product Manager	3. Proposed Classification
83923-3	V. Eagle	☑ None ☐ Restricted
4. Company/Product (Name)	**PM#**	
Ensystex IV, Inc. / Prothor SC 0.5	1	

5. Name and Address of Applicant *(Include ZIP Code)*

Ensystex IV, Inc.
c/o Pyxis Regulatory Consulting, Inc.
4110 136th St. NW
Gig Harbor, WA 98332

☐ *Check if this is a new address*

6. Expedited Reveiw. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to:

EPA Reg. No. _____

Product Name _____

Section - II

☐ Amendment - Explain below.

☑ Resubmission in response to Agency letter dated 10/17/2012

☐ Notification - Explain below.

☐ Final printed labels in repsonse to Agency letter dated _____

☐ "Me Too" Application.

☐ Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Resubmission of an amendment to the Confidential Statement of Formula per the Agency letter dated October 17, 2012. Submission of two revised Alternate Formulations. As no data are being submitted with this amendment, nor will data need to be reviewed to approve the proposed amendment, Ensystex IV, Inc. believes this action qualifies as a Fast Track amendment and is not subject to a Pesticide Registration Service Fee.

Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging	Unit Packaging	Water Soluble Packaging	2. Type of Container
☐ Yes ☑ No	☐ Yes ☑ No	☐ Yes ☑ No	☐ Metal ☑ Plastic ☐ Glass ☐ Paper ☐ Other (Specify)
***Certification must be submitted**	If "Yes" Unit Packaging wgt. / No. per container	If "Yes" Package wgt / No. per container	

3. Location of Net Contents Information	4. Size(s) Retail Container	5. Location of Label Directions
☑ Label ☑ Container	330 oz. (2.58 gallons)	☑ On Label ☐ On Labeling accompanying product

6. Manner in Which Label is Affixed to Product ☐ Lithograph ☑ Paper glued ☐ Stenciled ☐ Other _____

Section - IV

1. Contact Point *(Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)*

Name	Title	Telephone No. (Include Area Code)
Michael Kellogg	Agent	(253) 853-7369

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowlingllly false or misleeding statement may be punishable by fine or imprisonment or both under applicable law.

6. Date Application Received (Stamped)

2. Signature	3. Title
[signature]	Agent
4. Typed Name	**5. Date**
Michael Kellogg	3/12/13

Material Sent for Data Extraction

Reg. # 83923-3

Description: _____

☐ Material(s) Sent to Data Extraction Contractors:

- ☐ New Stamped Label Dated _____
- ☐ Notification Dated _____
- ☑ New CSF(s) Dated basic 5/9/12
- ☐ Other: _____

☐ Decision #: _____

☐ Other Action/Comments: _____

_____

File this coversheet and attached materials in the jacket. It must be well organized and clipped together, NOT STAPLED. Then give the jacket with the coversheet and materials to staff in the Information Services Center (ISC) (Room S-4900). If a jacket is full or only available as an image, please file materials in a new jacket and bring it down to the (ISC). For further information please call 703-605-0716.

Reviewer: Autumn Metzger

Phone: 305-5314 Division: RD - IRB

Date: 12/17/12

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

OCT 17 2012

Ensystex IV, Inc.
c/o Michael Kellogg
Pyxis Regulatory Consulting, Inc.
4110 136th St. NW
Gig Harbor, WA 98332

Dear Mr. Kellogg,

Subject: Revised Basic Confidential Statement of Formula (CSF), and proposed Alternate CSFs #1 & #2 all dated 8/9/2012
Prothor SC .5
EPA Reg. No. 83923-3

Of the CSFs referred to above, submitted in connection with your application for registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended **only the basic CSF submitted is acceptable. Tbe two alternate CSFs submitted were not acceptable** due to inert ingredients (a copy of the inert status form is included).

Therefore, for this product the only CSF currently on file with the EPA is:

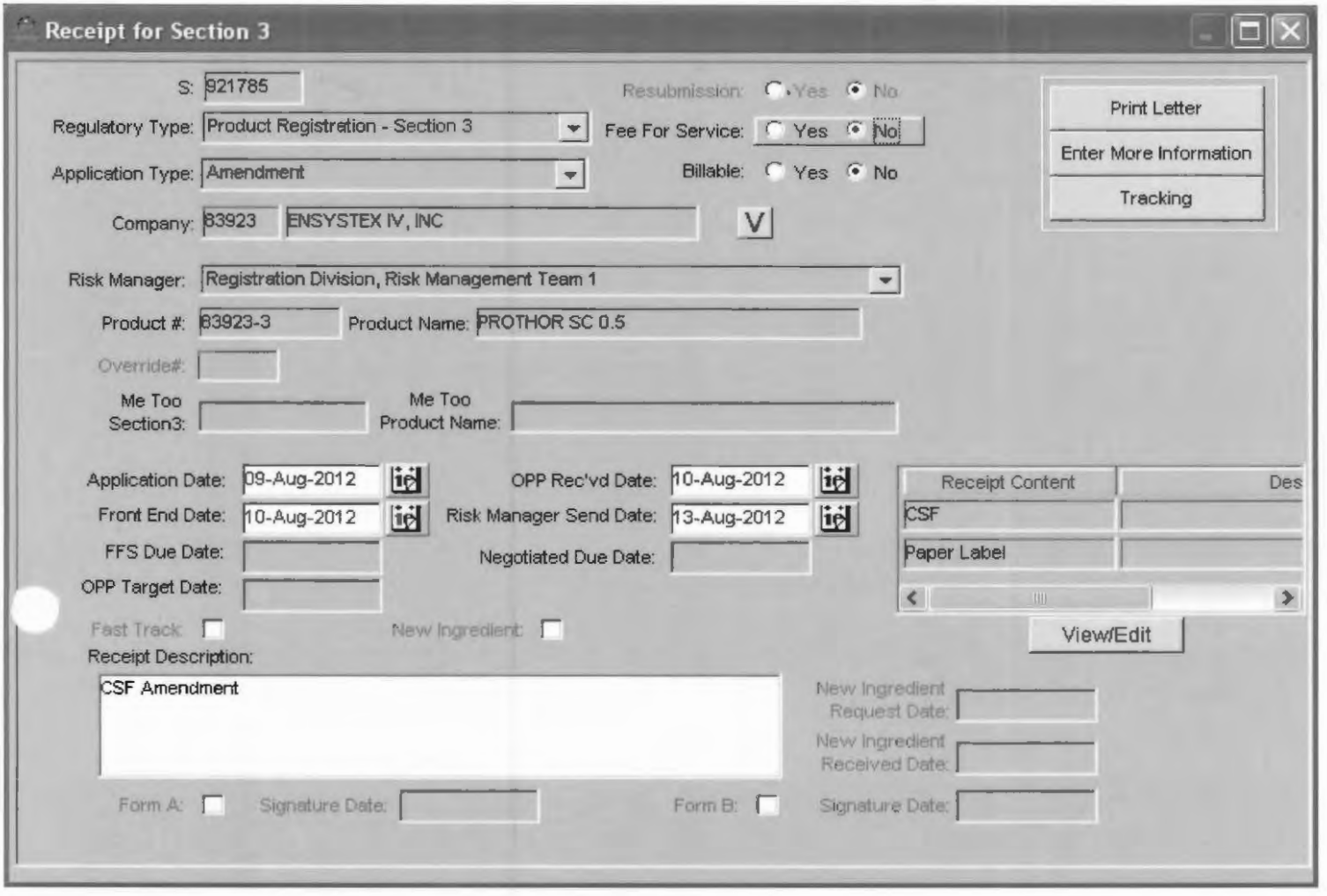
- **Basic CSF, dated 8/9/2012**

A copy will be placed in our records. This CSF will supersede all previous CSFs which will now be obsolete.

If you have any questions, please contact Autumn Metzger at (703) 305-5314 or Metzger.autumn@epa.gov.

Regards,

Venus Eagle (PM 01)
Insecticide-Rodenticide Branch
Registration Division (7505P)


Receipt for Section 3
S: 921785
Resubmission: Yes No
Regulatory Type: Product Registration - Section 3
Fee For Service: Yes No
Application Type: Amendment
Billable: Yes No
Company: 83923 ENSYSTEX IV, INC
Print Letter
Enter More Information
Tracking
Risk Manager: Registration Division, Risk Management Team 1
Product #: 83923-3
Product Name: PROTHOR SC 0.5
Override#:
Me Too Section3:
Me Too Product Name:
Application Date: 09-Aug-2012
OPP Rec'vd Date: 10-Aug-2012
Front End Date: 10-Aug-2012
Risk Manager Send Date: 13-Aug-2012
FFS Due Date:
Negotiated Due Date:
OPP Target Date:
Receipt Content
Des
CSF
Paper Label
Fast Track:
New Ingredient:
View/Edit
Receipt Description:
CSF Amendment
New Ingredient Request Date:
New Ingredient Received Date:
Form A:
Signature Date:
Form B:
Signature Date:

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

August 13, 2012

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

JANELLE KAY
PYXIS REGULATORY CONSULTING, INC.
ENSYSTEX IV, INC
4110 136TH STREET
GIG HARBOR, WA 98332-

PRODUCT NAME: PROTHOR SC 0.5
COMPANY NAME: ENSYSTEX IV, INC
OPP IDENTIFICATION NUMBER:
EPA FILE SYMBOL: 83923-3
EPA RECEIPT DATE: 08/10/12

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Registration Division, Risk Management Team 1, at (703) 308-8045.

Sincerely,

Front End Processing Staff
Information Services Branch
Information Technology & Resources Management Division

Fee for Service {921785F~

This package includes the following

- ○ New Registration
- ◉ Amendment

☐ Studies? ☐ Fee Waiver?

☐ volpay % Reduction: ___

for Division

- ○ AD
- ○ BPPD
- ◉ RD

Risk Mgr. 1

Receipt No. S- 921785

EPA File Symbol/Reg. No. 83923-3

Pin-Punch Date: 8/10/2012

☐ This item is NOT subject to FFS action.

Action Code:

Requested:

Granted:

Amount Due: $ _____

Parent/Child Decisions:

See status form attached to the CSFs. B. Dobosci 8/28/12

☐ Inert Cleared for Intended Use

☒ Uncleared Inert in Product

Reviewer: S Hitchcock Date: Aug 13 2012

Remarks:

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

CONTAINS CONFIDENTIAL BUSINESS INFORMATION

August 9, 2012

COURIER DELIVERY

Venus Eagle (PM 1)
Document Processing Desk (**AMEND**)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202-4501

RE: Ensystex IV, Inc. – Prothor SC 0.5 (EPA Reg. No. 83923-3)
Amendment to the Confidential Statement of Formula (CSF) – Submission of revised Basic CSF and addition of Two (2) Alternate CSF's

Dear Ms. Eagle,

On behalf of Ensystex IV, Inc. please find the enclosed amendment to the Prothor SC 0.5 formulation. Ensystex IV, Inc. is revising the Basic formulation and adding two additional alternate CSF's. Changes made to the CSF's are outlined below:

Basic Formulation

1) In keeping with the current Agency policy of not permitting "or" (i.e., alternate ingredients, suppliers, establishments, etc.) on the Basic CSF, [redacted]
2) [redacted]

Alternate Formulation #1

1) [redacted]
2) [redacted]
3) [redacted]

Alternate Formulation #2

1) Same changes as detailed above for Alternate Formulation #1
2) [redacted]

In support of this amendment, we submit the following documents:

1. Copy of the cover letter with Confidential Business Information redacted
2. Completed Application for Amendment (EPA Form 8570-1)
3. Two (2) copies of the Confidential Statements of Formula (Basic and Two (2) Alternate Formulations dated August 9, 2012)
4. MSDS sheets for the alternate inert ingredients being added which are listed above

The Basic and Alternate formulations submitted with this amendment application are intended to **REPLACE** any previously approved CSF's for Prothor SC 0.5.

As no data are being submitted with this amendment, nor will data need to be reviewed to approve the proposed amendment, Ensystex believes this action qualifies as a Fast Track amendment and is not

Inert ingredient information may be entitled to confidential treatment

subject to a Pesticide Registration Service Fee. Please feel free to call me if you have any questions or need any additional information.

Sincerely,

Michael Kellogg

Enclosures

cc: D. Nimocks; Ensystex IV, Inc.

Please read instructions on reverse before completing form. Form Approved. OMB No. 2070-0060. Approval expires 2-28-95

United States
Environmental Protection Agency
Washington, DC 20460

- [ ] Registration
- [x] Amendment
- [ ] Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number	2. EPA Product Manager	3. Proposed Classification
83923-3	V. Eagle	[x] None [ ] Restricted
4. Company/Product (Name)	**PM#**	
Ensystex IV, Inc. / Prothor SC 0.5	1	

5. Name and Address of Applicant *(Include ZIP Code)*
Ensystex IV, Inc.
c/o Pyxis Regulatory Consulting, Inc.
4110 136th St. NW
Gig Harbor, WA 98332
[ ] *Check if this is a new address*

6. Expedited Reveiw. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to:
EPA Reg. No. _____
Product Name _____

Section - II

- [ ] Amendment - Explain below.
- [ ] Resubmission in response to Agency letter dated _____
- [ ] Notification - Explain below.
- [ ] Final printed labels in repsonse to Agency letter dated _____
- [ ] "Me Too" Application.
- [ ] Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Submission of an amendment to the Confidential Statement of Formula. Submission of a revised Basic and two (2) Alternate Formulations. As no data are being submitted with this amendment, nor will data need to be reviewed to approve the proposed amendment, Ensystex believes this action qualifies as a Fast Track amendment and is not subject to a Pesticide Registration Service Fee.

Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging	Unit Packaging	Water Soluble Packaging	2. Type of Container
[ ] Yes [x] No	[ ] Yes [x] No	[ ] Yes [x] No	[ ] Metal [x] Plastic [ ] Glass [ ] Paper [ ] Other (Specify) _____
* ***Certification must be submitted***	If "Yes" Unit Packaging wgt. / No. per container	If "Yes" Package wgt / No. per container	

3. Location of Net Contents Information	4. Size(s) Retail Container	5. Location of Label Directions
[x] Label [x] Container	330 oz. (2.58 gallons)	[x] On Label [ ] On Labeling accompanying product

6. Manner in Which Label is Affixed to Product [x] Lithograph / Paper glued / Stenciled [ ] Other _____

Section - IV

1. Contact Point *(Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)*

Name	Title	Telephone No. (Include Area Code)
Michael Kellogg	Agent	(253) 353-7369

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowlingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

6. Date Application Received (Stamped)

2. Signature	3. Title
Michael Kellogg	Agent
4. Typed Name	**5. Date**
Michael Kellogg	8/9/12

EPA Form 8570-1 (Rev. 3-94) Previous editions are obsolete. White - EPA File Copy (original) Yellow - Applicant Copy

Material to be added to an e-Jacket/Jacket

Reg. No. 83923-3

Description: _____

_____

1. ☐ Placement within the e-Jacket/jacket:
   - ☐ Default: (chronological, top = newest)
   - ☐ File Location: (PDF page number, i.e., "before page 45")

   _____

   _____

2. ☐ Send to Data Extraction contractors this material:
   - ☐ Newly stamped accepted label
   - ☒ Notification
   - ☐ New CSF
   - ☐ Other: _____

3. Attach this coversheet to the top of the material or jacket. It must be well organized and clipped together, NOT STAPLED. Then give the material with this coversheet to staff in the Information Services Center (Room S-4900).

Reviewer's Name: Dani Daniel

Phone: 703 305-5409 Division: RD

Date: 04/09/2010

Created August 19, 2008

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

APR 0 8 2010

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Mr. Ross Gilbert
Ensystex IV, Inc.
c/o Pyxis Regulatory Consulting, Inc.
4110 136th St. NW
Gig Harbor, WA 98332

Subject: Revising the Container Disposal Instruction

Dear Mr. Gilbert:

The Agency is in receipt of your Application(s) for Pesticide Notification under Pesticide Registration Notice (PRN) 2007-4 dated March 19, 2010 for:

EPA Registration 83923-3

Prothor SC 0.5

The Registration Division (RD) has conducted a review of this request for applicability under PRN 2007-4 and finds that the label change(s) requested falls within the scope of PRN-2007-4. The label has been date-stamped "Notification" and will be placed in our records.

If you have any questions, call me at 703 305-5409 or electronically at daniel.dani@epa.gov.

Sincerely,

/s/

Dani Daniel
Registration Division (7504P)
Insecticide/Rodenticide Branch

NOTIFICATION

APR 0 9 2010

PROTHOR SC 0.5

For use only by individuals/firms licensed or registered by the state to apply termiticide products. States may have more restrictive requirements regarding qualifications of persons using this product. Consult the structural pest control regulatory agency of your state prior to use of this product.

For prevention or control of subterranean termites in and around residential, commercial, industrial, institutional and public structures and buildings.

Active Ingredient:	By Wt.
Imidacloprid	5.65%
Other Ingredients:	94.35%
TOTAL:	100.0%

Contains 0.5 pounds of imidacloprid per gallon

Shake well before using

EPA Reg. No. 83923-3 EPA Est. XXXXX-XX-XXX

STOP – Read the label before use

KEEP OUT OF REACH OF CHILDREN

CAUTION

(PRECAUCION AL USUARIO: Si usted no puede leer o entender ingles, no use este producto hasta que la etiqueta le haya sido explicada ampliamente.)

(TO THE USER: If you cannot read and understand English, do not use this product until the label has been fully explained to you.)

For product use information call 1-866-FOR-THOR (367-8467) or visit www.for-thor.com.

NET CONTENTS: As marked on container

Manufactured by:

ENSYSTEX IV, Inc.

Fayetteville, NC 28303

FIRST AID	
If swallowed	• Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by a poison control center or doctor. • Do not give anything by mouth to an unconscious person.
If on skin or clothing	• Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15 to 20 minutes. • Call a poison control center or doctor for treatment advice.
If in eyes	• Hold eye open and rise slowly and gently with water for 15 to 20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.

HOTLINE NUMBER

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-866-367-8467 for emergency medical treatment information.

NOTE TO PHYSICIAN

No specific antidote is available. Treat the patient symptomatically.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION

Harmful if swallowed, inhaled or absorbed through skin. Causes eye irritation. Avoid contact with skin, eyes or clothing. Avoid breathing dust or vapor. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing and wash before reuse. Keep children and pets away from treated area until dry.

Personal Protective Equipment: All pesticide handlers (mixers, loaders and applicators) must wear long-sleeved shirt and long pants, socks, shoes and chemical-resistant gloves made of waterproof material such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, polyethylene, polyvinyl chloride or viton. After the product is diluted in accordance with label directions for use, shirt, pants, socks and chemical-resistant gloves are sufficient protection. All pesticide handlers must wear protective eyewear, such as goggles, faceshield or safety glasses, when working in a non-ventilated space or when applying as a termiticide by rodding or sub-slab injection.

Termite Control Treatment: When treating adjacent to an existing structure, the applicator must check the area to be treated and immediately adjacent areas of the structure for visible and accessible cracks and holes to prevent any leaks or significant exposures to persons occupying the structure. People present or residing in the structure during application must be advised to remove their pets and themselves from the structure if they see any signs of leakage. After application, the applicator is required to check for leaks. All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site. Do not allow people or pets to contact contaminated areas or to reoccupy contaminated areas of the structure until the cleanup is completed.

Environmental Hazards

This pesticide is highly toxic to aquatic invertebrates. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters. Apply this product only as specified on this label. Extreme care must be taken to avoid runoff. Apply only to soil or other fill substrate that will accept the solution at the specified rate. Do not treat soil that is water-saturated or frozen or in any conditions where run-off or movement from the treated area (site) is likely to occur.

Physical and Chemical Hazards

Do not apply this product or solutions of this product around electrical equipment, such as electrical conduits, motor housings, junction boxes, switch boxes, etc. due to the possibility of shock hazard.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Keep out of reach of children and animals. Store in original containers only. Store in a cool, dry place and avoid excess heat. Handle and open container in a manner so as to prevent spillage. Do not put concentrate or dilute material into food or drink containers. Preferably store in a locked area.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site (in the treatment area) or at an approved waste disposal facility.

Container Disposal: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or by incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke. Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container 1/4 full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

In Case of Spill: Confine it, avoid contact, isolate area and keep animals and unprotected persons away. If spill is liquid, form dike around spill area and/or absorb spill with absorbent materials, such as sand, cat litter or clay. If spill is dry powder only, sweep material into a suitable container. Place damaged package in a holding container and identify contents. Contact Ensystex IV at 1-866-367-8467 or Chemtrec at 1-800-424-9300 for any assistance.

APPLICATION FOR CONTROL OF SUBTERRANEAN TERMITES

General

PROTHOR SC 0.5, in the form of a dilute insecticidal solution, prevents and controls subterranean termite infestations in and around structures and other items by creating a continuous chemically treated zone (horizontal and/or vertical as needed) between the wood and other cellulose material in a structure and termite colonies in the soil. In order to establish a zone between the wood in the structure and the termites in the soil, adequately disperse the solution of this product in the soil.

To effectively control subterranean termites with this product, the service technician should be familiar with current subterranean termite control practices including trenching, rodding, sub-slab and void injection, soil surface fan spraying and excavated soil treatment. Correct use of these techniques is necessary to effectively control infestations by subterranean termites such as *Coptotermes, Heterotermes and Reticulitermes*. The service technician should consider the biology and behavior of the termite specie(s) to be controlled to determine which control practices to use.

Treatment standards and procedures for subterranean termite control may vary due to regulations, water table level, structure design, soil types, construction practices and other factors. For advice concerning current control practices with respect to specific local conditions, consult resources in structural pest control and state cooperative extension and regulatory agencies. Follow all federal, state and local regulations and treatment standards for protection of a structure from subterranean termites.

Effective termite control may also include mechanical alteration of the structure. Elimination of leaks or points of moisture accumulation within or on the exterior of the structure that result in an increase in the moisture content of wooden structural components is advised. Removal of non-essential cellulose containing materials that are in contact with the ground under or around the structure can reduce termite foraging in the area.

PROTHOR SC 0.5 is labeled for use against subterranean termites as a 0.05% to 0.10% solution in water. Generally, the 0.05% rate is used for typical control situations. When severe or persistent infestations are occurring, a 0.10% solution may be more appropriate. When difficult or problem soils or construction types are encountered, it may be necessary to use 0.10% PROTHOR SC 0.5 mixed in reduced volumes of water.

Avoid contamination of water supplies due to backflow under reduced water system pressure by using anti-backflow equipment or procedures to prevent siphoning of any solution back into a water supply. Do not contaminate cisterns or wells. Do not treat soil that is water saturated or frozen. Do not treat while precipitation is occurring. Do not apply solution to an area or site if the soil at the area or site is in such a state or condition that runoff or movement of the solution from the treated area or site is likely to occur. Structures that contain wells or cisterns within the foundation of the structure can only be treated using the treated backfill method described in the treatment around wells and cisterns section of this label. Consult state and local specifications for recommended distances of wells from treated areas, or if such regulations do not exist, refer to Federal Housing Administration Specifications (H.U.D.) for guidance.

Dilution and Mixing of PROTHOR SC 0.5

Use rates for PROTHOR SC 0.5 are expressed and the solution is mixed according to the percentage (%) concentration it forms when mixed in water. Use the *Mixing Table for PROTHOR SC 0.5* or alternately the formulas below to determine the amount of PROTHOR SC 0.5 to add to any quantity of water.

To mix, measure out the required amount of PROTHOR SC 0.5 according to the *Mixing Table for PROTHOR SC 0.5*. Pour this amount of PROTHOR SC 0.5 into the spray tank as it is being filled with water with the agitator operating.

Mix PROTHOR SC 0.5 to create a use dilution in the following manner:

1. Fill tank 1/4 to 1/3 full.
2. Start pump to begin by-pass agitation and place end of treating tool in tank to allow circulation through hose.
3. Add appropriate amount of PROTHOR SC 0.5.
4. Add remaining amount of water.
5. Let pump run and allow recirculation through the hose for 2 to 3 minutes.

Prothor SC may also be mixed into full tanks of water, but substantial agitation is required to ensure uniformity of the solution.

Mixing Table for PROTHOR SC 0.5

Solution Percentage Concentration Desired	Gallons of Finished Solution Desired	Fluid Ounces of PROTHOR SC 0.5 to add
0.05%	25	27.5
	50	55.0
	100	110.0
0.10%	25	55.0
	50	110.0
	100	220.0

Calculating an Amount of PROTHOR SC 0.5 to Mix

To mix any amount of PROTHOR SC 0.5 determine:

A = Gallons of water into which PROTHOR SC 0.5 will be mixed. Express any partial gallons as decimal fractions (1/2 = .5)

Fluid ounces of PROTHOR SC 0.5 to add to A gallons for 0.05% = A x 1.1

Fluid ounces of PROTHOR SC 0.5 to add to A gallons for 0.10% = A x 2.2

Proportional Injector Mixing Table For PROTHOR SC 0.5

Solution Percentage Concentration Desired	Injector Volume (fluid ounces per gallon)
0.05%	1.10
0.10%	2.20

Application Volume

To provide maximum control and protection against termite infestation, apply the specified volume of the finished water solution containing the specified amount of PROTHOR SC 0.5 as set out below or as otherwise directed in this label.

Prescribed Horizontal Barrier Rate: Unless otherwise directed, horizontal barriers are created by applying a 0.05% to 0.10% solution at a rate of one gallon of solution per 10 square feet.

Prescribed Vertical Barrier Rate: Unless otherwise directed, vertical barriers are created by applying a 0.05% to 0.10% solution at a rate of four gallons of solution per 10 linear feet per foot of depth.

Adjustments to Application Volume

If soil will not accept the labeled application volumes, the volume may be reduced provided there is a corresponding increase in concentration so that the amount of active ingredient applied to the soil remains the same.

Note: Large reductions of application volume reduce the likelihood of obtaining a continuous barrier. Variance is allowed when volume and concentration are consistent with label directed rates and a continuous barrier can still be achieved. When volume is reduced, the spacing of holes created for sub slab injection and soil rodding may need to be reduced to account for decreased dispersion of the solution in the soil.

For example, adjust the amount of solution applied to deliver a horizontal barrier of 10 square feet from 1 gallon to as low as 0.5 gallons and as high as 2 gallons while maintaining the amount of PROTHOR SC 0.5 applied per 10 square feet.

For example, adjust the amount of solution applied to deliver a vertical barrier 10 feet long by one foot deep from 4 gallons to as low as 2 gallons and as high as 8 gallons while maintaining the amount of PROTHOR SC 0.5 applied per 10 linear feet.

PRE-CONSTRUCTION TREATMENT

All Structures

Do not apply at a lower dosage and/or concentration than specified on this label for applications prior to the installation of the finished grade.

Prior to each application, applicators must notify the general contractor, construction superintendent, or similar responsible party, of the intended termiticide application and intended sites of application and instruct the responsible person to notify construction workers and other individuals to leave the area to be treated during application and until the termiticide is absorbed into the soil.

Concrete Slab On Ground or Basements

Apply an overall treatment to the entire surface of soil or other substrate to be covered by the slab including areas to be under carports, porches, basement floors and entrance platforms. Apply solution uniformly at the Prescribed Horizontal Barrier Rate. If fill under slab is gravel or other coarse aggregate, apply at the rate of 1.5 gallons per 10 square feet or sufficient volume of solution to uniformly cover each 10 square feet. To provide a uniform treated zone in soil at critical areas such as along the inside of foundation walls, and around plumbing, bath traps, utility services, and other features that will penetrate the slab, apply solution at the Prescribed Vertical Barrier Rate to these areas.

After completion of grading, make an application by trenching or trenching and rodding around the slab or foundation perimeter and applying solution at the Prescribed Vertical Barrier Rate. Rodding may be done from the bottom of a shallow trench. When rodding, rod holes must be spaced in a manner that will allow for a continuous chemical treated zone to be deposited along the treated area (place holes 12 or fewer inches apart). Rod holes should not extend below the footing. When trenching, the trench along the outside foundation should be about 6 inches in width and 6 inches in depth. Use a low pressure spray (not to exceed 25 PSI at the treatment tool when the valve is open) to treat the soil which will be placed into the trench after rodding. Mix the spray solution with soil as it is being placed in the trench. When treating voids in hollow masonry units, apply 2 gallons of solution per 10 linear feet of wall. Apply solution so it will reach the footing by injecting into the lower areas of the wall, just above the floor or footing.

When treating foundations deeper than 4 feet, apply the termiticide as the backfill is being replaced, or if the construction contractor fails to notify the applicator to permit this, treat the foundation to a minimum depth of 4 feet after the backfill has been installed. The applicator must trench and rod into the trench or trench along the foundation walls and around pillars and other foundation elements and treat the soil at the Prescribed Vertical Barrier Rate from grade to a minimum depth of 4 feet. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. However, in no case should a structure be treated below the footing. Rodding in trench followed by flooding of trench and treatment of backfill may provide a better chance of achieving a continuous treated zone than using soil rodding alone to establish a vertical treated zone.

Crawl Spaces

Application must be made by trenching or trenching and rodding downward along the inside and outside of foundation walls, around piers, interior supports in contact with the soil, plumbing, and utility services at the Prescribed Vertical Barrier Rate. Rodding may be done from the bottom of a shallow trench to the top of the footing or a minimum of 4 feet. When rodding, rod holes must be spaced in a manner that will allow for a continuous treated zone to be deposited along the treated area. Rod holes should not extend below the footing. When trenching, the trench should be about 6 inches wide and 6 inches deep. Use a low pressure spray to treat soil which will be placed in the trench, mixing the spray solution with soil as it is being placed in the trench.

Hollow Block Foundations and Voids

Hollow block foundations or voids in masonry resting on the footing may be treated to create a continuously treated zone in the voids at the footing. Apply 2 gallons of solution per 10 linear feet to the lower part of the void so that it reaches the top of the footing or soil. Treatment of voids in block or rubble foundation walls must be closely examined. Applicators must inspect areas of possible runoff as a precaution against application leakage in the treated areas. Some areas may not be treatable or may require mechanical alteration prior to treatment. All leaks resulting in the deposition of termiticide in locations other than those prescribed in this label must be cleaned up prior to leaving the application site (refer to Precautionary Statements). Do not allow people or pets to contact or to reoccupy the contaminated areas of the structure until the clean up is completed.

POST CONSTRUCTION TREATMENT

All Structures

Do not apply treatment until the identity and location of all wells, radiant heat pipes, water and sewer lines, electrical conduits and sub-slab heating and air conditioning ducts is established. Caution must be taken to avoid puncturing these elements and/or injecting solution into them. All holes in commonly occupied areas into which material has been applied must be plugged. Plugs must be of a non-cellulose material or covered by an impervious, non-cellulose material.

Vertical Barrier Depth: For applications made after the final grade is installed, the applicator must trench and rod into the trench or trench along the foundation walls and around pillars and other foundation elements and treat at the rate prescribed from grade to the top of the footing. When the footing is more than four (4) feet below grade, the applicator must trench and rod into the trench or trench along the foundation walls and treat at the rate prescribed to a minimum depth of four feet. The actual depth of treatment will vary depending on the soil type, degree of compaction, and location of termite activity. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. However, in no case should a structure be treated below the footing.

Structures Containing Concrete Slabs on Ground (Monolithic/Floating/Supported) including Basements

To make an application beneath existing slabs, it may be necessary to drill holes in the slab or adjacent foundation and to apply solution. Holes should be spaced such that when treatment is applied through them, a continuous treated zone is applied beneath the slab.

Treat all existing cracks and cold, construction or expansion joints. Also, treat around bath traps, plumbing and utility services which penetrate the slab. Apply 4 gallons per 10 lineal feet per foot of depth to provide a uniform treated zone.

Vertical Barriers Along Exterior of Foundation Walls: Trench and rod into the trench or trench along the outside of foundation walls and treat at the Prescribed Vertical Barrier Rate to the depth specified under Vertical Barrier Depth. Where physical obstructions such as concrete walkways adjacent to foundation elements or soil type and/or conditions make trenching prohibitive, treatment may be made by rodding alone.

Vertical Barriers Along Interior of Foundation Walls: Vertical barriers may be established on the interior side of foundation walls by sub-slab injection of the solution at the Prescribed Vertical Barrier Rate. Injection openings can be drilled either vertically through the slab along the interior of the foundation wall or horizontally from the exterior through the foundation wall low enough on the wall to allow for the deposition of the solution beneath the slab along the interior side of the foundation wall. Drill holes should be spaced so as to achieve a continuous chemical barrier but in no case farther apart than 12 inches. Special care must be taken to distribute the solution evenly. Vertical barriers may also be established beneath the slab along both sides of interior footing-supported walls, one side of interior partitions and along all cracks and expansion joints and utility service entrances and bath traps.

Horizontal Barriers Beneath Slabs on Ground: Create a horizontal barrier by treating at the Prescribed Horizontal Barrier Rate beneath slabs by either drilling and long rodding from the exterior or by grid pattern drilling and injection vertically through the slab. Long rodding should be used only when grid pattern drilling and injection and horizontal short rodding and injection cannot be used to deliver the sub slab treatment.

Bath Traps: Exposed soil beneath and around areas where plumbing and utility services penetrate the slab should be treated at the rate of 3 gallons of solution per square foot of soil.

Structures Containing Accessible Crawl Spaces

For crawl spaces, including sealed underfloor spaces that serve as heating and air conditioning plenums, apply vertical termiticide barriers at the rate of 4 gallons of solution per 10 linear feet per foot of depth from grade to the top of the footing, or if the footing is more than 4 feet below grade, to a minimum depth of 4 feet. Apply by trenching and rodding into the trench, or trenching. Treat both sides of foundation and around all piers and pipes. Where physical obstructions such as concrete walkways adjacent to foundation elements prevent trenching, treatment may be made by rodding alone. When soil type and/or conditions make trenching prohibitive, rodding may be used. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. Read and follow the mixing and use direction section of the label if situations are encountered where the soil will not accept the full application volume.

1. Rod holes and trenches must not extend below the bottom of the footing.

2. Rod holes must be spaced so as to achieve a continuous termiticide barrier but in no case more than 12 inches apart.

3. Trenches must be a minimum of 6 inches deep or to the bottom of the footing, whichever is less, and need not be wider than 6 inches. When trenching in sloping (tiered) soil, the trench must be stepped to ensure adequate distribution and to prevent termiticide from running off. The solution must be mixed with the soil as it is replaced in the trench.

4. When treating crawl spaces used as plenums, turn off the air circulation system of the structure until application has been completed and all solution has been absorbed by the soil.

Subterranean termites can be prevented from constructing shelter tubes directly between the crawl space soil surface and overhead crawl space wooden members by the application of an overall treatment of the crawl space soil surface at the Prescribed Horizontal Barrier Rate using a 0.05% to 0.10% solution of PROTHOR SC 0.5.

PROTHOR SC 0.5 can be applied as a general fan spray within crawl spaces directly to swarming and exposed worker termites at the Prescribed Horizontal Barrier Rate using a 0.05% to 0.10% solution of PROTHOR SC 0.5.

Note: Overall treatments (treatments where chemical is applied more than 18 inches from the foundation walls, piers and pipes) should not be applied within a crawl space that serves as a plenum.

Structures Containing Inaccessible Crawl Spaces

For inaccessible interior areas, such as areas where there is insufficient clearance between floor joists and ground surfaces to allow operator access, excavate, if possible, and treat according to the instructions for accessible crawl spaces. Otherwise, apply one or a combination of the following two methods.

1. To establish a horizontal barrier, apply to the soil surface 1 gallon of solution per 10 square feet overall using a nozzle pressure of less than 25 p.s.i. and a coarse application nozzle (e.g., Delavan Type RD Raindrop, RD-7 or larger, or Spraying Systems Co. 8010LP TeeJet or comparable nozzle). For an area that cannot be reached with the application wand, use one or more extension rods to make the application to the soil. Do not broadcast or power spray with higher pressures.

2. To establish a horizontal barrier, drill through the foundation wall or through the floor above and treat the soil perimeter at a rate of 1 gallon of solution per 10 square feet. Drill spacing must be at intervals not to exceed 16 inches. Many states have smaller intervals, so check state regulations which may apply.

When treating crawl spaces used as plenums, turn off the air circulation system of the structure until application has been completed and all termiticide has been absorbed by the soil.

Note: Overall treatments (treatments where chemical is applied more than 18 inches from the foundation walls, piers and pipes) should not be applied within a crawl space that serves as a plenum.

Masonry Voids

Drill and treat voids in multiple masonry elements of the structure extending from the structure to the soil in order to create a continuous treatment barrier in the area to be treated. Apply at the rate of 2 gallons of solution per 10 linear feet of footing using a nozzle pressure of less than 25 p.s.i. When using this treatment access holes must be drilled below the sill plate and should be as close as possible to the footing as is practical. Treatment of voids in block or rubble foundation walls must be closely examined. Applicators must inspect areas of possible runoff as a precaution against application leakage in the treated areas. Some areas may not be treatable or may require mechanical alteration prior to treatment.

All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site. Do not allow people or pets to contact contaminated areas or to reoccupy the contaminated areas of the structure until the clean-up is completed.

Note: When drilling veneer walls, care should be taken to not drill beyond the depth of the void behind the veneer into another construction layer behind the veneer. It is however permissible to drill through the veneer and into concrete blocks behind the veneer and to treat the veneer and the concrete blocks at the same time.

Note: Not for use in voids insulated with rigid foam.

TREATMENT OF STRUCTURES WITH WELLS AND CISTERNS

Do not contaminate wells or cisterns.

Structures with Wells/Cisterns Inside Foundations

Structures that contain wells or cisterns within the foundation of a structure can only be treated using the following techniques:

Do not treat soil while it is beneath or within the foundation or along the exterior perimeter of a structure that contains a well or cistern. The treated backfill method must be used if soil is removed and treated outside/away from the foundation. The treated backfill technique is described as follows:

a. Trench and remove soil to be treated onto heavy plastic sheeting or similar material or into a wheelbarrow.

b. Treat the soil at the rate of 4 gallons of dilute solution per 10 linear feet per foot of depth of the trench, or 1 gallon per 1.0 cubic feet of soil. See *Mixing Directions for PROTHOR SC 0.5 for Use as a Termiticide* section of the label. Mix thoroughly into the soil taking care to contain the liquid and prevent runoff or spillage.

c. After the treated soil has absorbed the solution, replace the soil into the trench.

Structures with Adjacent Wells/Cisterns and/or Other Water Bodies

Applicators must inspect all structures with nearby water sources such as wells, cisterns, surface ponds, streams, and other bodies of water and evaluate, at a minimum, the treatment recommendations listed below prior to making an application.

1. Prior to treatment, if feasible, expose the water pipe(s) coming from a well to the structure, if the pipe(s) enter the structure within 3 feet of grade.

2. Prior to treatment, applicators are advised to take precautions to limit the risk of applying the termiticide into subsurface drains that could empty into any bodies of water. These precautions include evaluating whether application of the termiticide to the top of the footer may result in contamination of the subsurface drain. Factors such as depth to the drain system and soil type and degree of compaction should be taken into account in determining the depth of treatment.

3. When appropriate (for example, on the water side of the structure), the treated backfill technique (described above) can also be used to minimize offsite movement of termiticide.

FOAM APPLICATION

PROTHOR SC 0.5, in the form of a foam, can be used to deliver PROTHOR SC 0.5 as a termiticide any time it appears likely this form of delivery will improve the dispersal of PROTHOR SC 0.5 into and within the intended target area. Construction practices, soil subsidence and other factors may create situations in which a continuous treated zone cannot be achieved using conventional treatment alone. In these situations or wherever else it becomes necessary, conventional application methods can be supplemented through the use of foam (created by the use of foam generating equipment, or similar devices) to create a continuous treated zone. Foam can be particularly useful to deliver PROTHOR SC 0.5 where it either cannot be depended upon to be delivered as just a solution or due to a need to reduce the amount of water used in order to avoid water damage to the target or adjacent areas.

Depending on the circumstances, foam applications of PROTHOR SC 0.5 may be used alone or in combination with liquid solution applications, provided that the cumulative amount of active ingredient applied per unit of area is equivalent to that which would be applied according to a solution-only application at the recommended rate. At least 75% of the gallons of PROTHOR SC 0.5 must be applied as a typical liquid treatment. The remaining 25% or less gallons can be delivered to appropriate locations using a foam application. The application of the correct volume and amount of active ingredient are essential to the application of an effective treatment.

Foam Mixing Instructions

27.5 ounces of PROTHOR SC 0.5 can be mixed with between 1 and 5 gallons of water and expanded to create 25 gallons of foam containing 0.05% active ingredient. 55.0 ounces of PROTHOR SC 0.5 can be mixed with between 1 and 5 gallons of water and expanded to create 50 gallons of foam containing 0.05% active ingredient. See the Foam Mixing and Expansion Table below for foam mixing and expansion ratios.

Foam Mixing and Expansion Table (all mixes produce 0.05% active ingredient foam)

Gallons of Foam Desired	Gallons of Water*	Amt. of PROTHOR SC 0.5 to Add to Water	Expansion Ratios
25	1.0	27.5 ounces	25:1
25	2.5	27.5 ounces	10:1
25	5.0	27.5 ounces	5:1
50	1.0	55.0 ounces	50:1
50	2.5	55.0 ounces	20:1
50	5.0	55.0 ounces	10:1

*Add the foaming agent manufacturer's recommended amount of foaming agent to solution after water and PROTHOR SC 0.5 are mixed. Verify that the foaming agent is compatible with PROTHOR SC 0.5 before mixing or using with PROTHOR SC 0.5.

Foam Application Use Directions

Using foam generating equipment, a solution of PROTHOR SC 0.5 (see Foam Mixing Instructions) may be converted into a predetermined amount foam according to the foaming agent and foaming equipment manufacturer's recommendations. Verify that the foaming agent is compatible with PROTHOR SC 0.5.

First, form a solution of PROTHOR SC 0.5 of the appropriate percentage concentration and volume (see Foam Mixing Instructions). Then add to the solution the recommended volume of foaming agent according to the foaming agent manufacturer's directions.

Foam applications may be made behind veneers, piers, chimney bases, into rubble foundations, into block voids, structural voids or other similar voids, under slabs, stoops, porches or to the soil in crawlspaces. Use dispersion tips and application methods appropriate to the site. Always apply a sufficient volume of PROTHOR SC 0.5 in the form of a foam alone or in combination with a liquid solution to provide a continuous treated zone at the recommended rate for specific application sites.

RETREATMENT

Retreatments for subterranean termites can only be performed if there is clear evidence of reinfestation or disruption of the barrier due to construction, excavation or landscaping and/or evidence of the breakdown of the termiticide barrier in the soil. These vulnerable or reinfested areas may be retreated in accordance with application techniques described in this product's labeling. The timing and type of these retreatments will vary, depending on factors such as termite pressure, soil types, soil conditions and other factors which may reduce the effectiveness of the barrier. Retreatment may be made as either a spot or complete treatment.

Retreatments in the absence of reinfestation or barrier disruption may be performed five or more years after a complete treatment was last applied to the structure. Such retreatments should be made based on the judgment of the applicator that such retreatment is necessary to ensure the continued protection of the structure from termite attack. In making such judgment, the applicator should take into account the expected useful life of the last treatment administered (based on efficacy testing) and conditions specific to the structure in question that may increase it vulnerability to attack.

Annual retreatment of the structure is prohibited unless there is clear evidence that reinfestation or treated zone disruption has occurred.

APPLICATION IN CONJUNCTION WITH BORATES AND TERMITE BAITS

Spot only applications of PROTHOR SC 0.5 can be used as a supplement to borate treatments and termite baiting system installations that are labeled for stand alone protection against termite attack. Stand alone product is defined as a product that is labeled for the protection of a structure when applied alone without the use of other termite control products. Spot only applications are defined as the use of PROTHOR SC 0.5 according to any of the permitted and applicable post-treatment application techniques contained in this label alone or in combination, to the extent needed or deemed necessary or useful as an adjunct to the application of a standalone product.

APPLICATION TO PROTECT UNDERGROUND ITEMS FROM SUBTERRANEAN TERMITE ATTACK

To protect components installed underground such as wires, conduits, cables and pipes buried in soil against termite attack, create an envelope of PROTHOR SC 0.5 treated soil around the components along the entire underground length of the component. First, treat soil through which components will be run with 0.05% to 0.10% solution of PROTHOR SC 0.5 at a rate of 2 gallons of solution per 10 linear feet. Install components, laying them on the treated soil. Cover components with untreated soil and then treat this covering soil using the same percent solution at 2 gallons of solution per 10 linear feet.

Underground components to be protected may be located within the foundation of a structure or outside of a structure such as within a utility right of way, for example. Do not treat items that are electrically energized at the time of application. If the soil will not absorb the indicated amount of solution, as little as 1 gallon of 0.10% solution per 10 linear feet can be used. Treat points where services emerge from the ground at a rate of 1 to 2 gallons of solution at the point of emergence.

APPLICATIONS TO PROTECT POLES, POSTS AND OTHER WOODEN ITEMS FROM SUBTERRANEAN TERMITE ATTACK

PROTHOR SC 0.5 can be used to protect the below ground portions of wooden structural components from termites. Form a treated zone around components below ground by vertically rodding the soil around their perimeter to a depth of six inches below their maximum depth of placement in the soil and applying a 0.05% to 0.10% solution of PROTHOR SC 0.5 at a rate of 0.4 gallons of solution per linear foot of perimeter around the component per foot of treated depth. Measure the perimeter of the component six inches from the outside of the component.

APPLICATIONS TO TERMITE CARTON NESTS LOCATED IN ABOVE GROUND WALL VOIDS

Apply a 0.05% to 0.10% solution of PROTHOR SC 0.5 directly into above ground termite carton nests including nests located in wall voids using a directional injector. Apply as a solution or foam under pressure to distribute solution thoroughly throughout the nest. It may be necessary to inject solution at one or more points and at varying depths within the nest to adequately distribute solution within the interior of the nest.

EXTERIOR APPLICATION FOR ANT CONTROL

Apply a 0.05% to 0.10% solution of PROTHOR SC 0.5 to the exterior of the structure as a general surface, spot, crack and crevice or wall void treatment. Apply at points where ants may enter the structure or crawl and hide including exterior surfaces, around doors and windows, under eaves, attic and foundation vents, utility entrances and cracks in the surface of the structure. Spray solution or foam into voids where ants or their nests are present. Apply a volume of solution sufficient to cover the target surface(s) however avoid excess dripping or runoff from vertical or overhead surfaces.

Treat soil, turf or ground cover (flower, shrub and plant beds) adjacent to the structure where ants are trailing or may find food. Ants tunneling in the soil may be controlled by applying a 0.05% to 0.10% solution of PROTHOR SC 0.5 as a drench or soil injection along the edge of foundations or other hard surfaces such as driveways. Apply in a volume sufficient to treat or cover the soil or foliage.

Inject a 0.05% to 0.10% solution of PROTHOR SC 0.5 in the form of a spray or foam into tree cavities or other parts of trees where ant nests are located.

Do not treat more often than once per month. Do not allow residents or pets into the immediate area during application or allow them to make contact with treated areas until sprey has dried.

It is recommended to remove or prune away shrubbery, bushes and tree branches touching the structure. Vegetation touching the structure may offer a route of entry for ants into the structure that allow ants to inhabit the structure without coming in contact with the treatment. If nests are found, direct treatment of nests with PROTHOR SC 0.5 can be made.

Do not use PROTHOR SC 0.5 against native fire ants, imported fire ants, pharaoh ants or harvester ants. Limit applications for control of carpenter ants to treatment of non-wooden parts or surfaces of structures.

ATTENTION

Do not apply to soil in areas where edible plants may be planted. Do not plant edible plants in soil that has been treated with PROTHOR SC 0.5.

IMPORTANT READ BEFORE USE

NOTICE: Read the entire Directions for Use, Conditions of Sale, Disclaimer of Warranties and Limitations of Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

CONDITIONS OF SALE: The Directions for Use of this product are believed to be adequate and must be followed carefully. However, because of manner of use and other factors beyond the control of Ensystex IV, Inc., it is impossible for Ensystex IV to eliminate all risks associated with the use of this product such as ineffectiveness or unintended consequences. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold Ensystex IV harmless for any claims relating to such factors.

DISCLAIMER OF WARRANTIES: To the extent consistent with applicable law, seller warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the Directions for Use when used in accordance with the Directions for Use under normal conditions of use. ENSYSTEX IV MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE, NOR ANY OTHER EXPRESS OR IMPLIED WARRANTIES WITH RESPECT TO THE SELECTION, PURCHASE, OR USE OF THIS PRODUCT THAT EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. Any warranties, express or implied, having been made are inapplicable if this product has been used contrary to label instructions, under abnormal conditions or under conditions not reasonably foreseeable by (or beyond the control of) seller or Ensystex IV, Inc., and buyer assumes the risk of any such use.

LIMITATIONS OF LIABILITY: To the extent consistent with applicable law, Ensystex IV shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF ENSYSTEX IV AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ENSYSTEX IV, THE REPLACEMENT OF THE PRODUCT.

This Conditions of Sale and Limitation of Warranty and Liability may not be amended by any oral or written agreement.

PROTHOR is a registered trademark of Ensystex IV, Inc.

~~Revised 3/07~~EPA 20100319

Please read instructions on reverse before completing form. NOTIFICATION Form Approved. OMB No. 2070-0060. Approval expires 2-28-95

EPA

United States
Environmental Protection Agency
Washington, DC 20460

APR 09 2010

- [ ] Registration
- [ ] Amendment
- [x] Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number	2. EPA Product Manager	3. Proposed Classification
83923-3	V. Eagle	[x] None [ ] Restricted
4. Company/Product (Name)	**PM#**	
Ensystex IV, Inc. / Prothor SC 0.5	1	

5. Name and Address of Applicant *(Include ZIP Code)*
Ensysytex IV, Inc.
c/o Pyxis Regulatory Consulting, Inc.
4110 136th St. NW
Gig Harbor, WA 98332

[ ] *Check if this is a new address*

6. Expedited Reveiw. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to:
EPA Reg. No. _____
Product Name _____

Section - II

- [ ] Amendment - Explain below.
- [ ] Resubmission in response to Agency letter dated _____
- [x] Notification - Explein below.
- [ ] Final printed labels in repsonse to Agency letter dated _____
- [ ] "Me Too" Application.
- [ ] Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Notification of label change per PR Notice 2007-4. This notification is consistent with the guidance in PR Notice 2007-4 and the requirements of EPA's regulations at 40 CFR 156.10, 156.140, 156.144, 156.146, and 156.156. No other changes have been made to the labeling or the Confidential Statement of Formula for this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if the amended label is not consistent with the requirements of 40 CFR 156.10, 156.140, 156.144, 156.146, and 156.156, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging	Unit Packaging	Water Soluble Packaging	2. Type of Container
[ ] Yes [x] No	[ ] Yes [x] No	[ ] Yes [x] No	[ ] Metal [x] Plastic [ ] Glass [ ] Paper [ ] Other (Specify) _____
***Certification must be submitted**	If "Yes" Unit Packaging wgt. / No. per container	If "Yes" Package wgt / No. per container	

3. Location of Net Contents Information	4. Size(s) Retail Container	5. Location of Label Directions
[ ] Label [x] Container	330 oz. (2.58 gallons)	[x] On Label [ ] On Labeling accompanying product

6. Manner in Which Label is Affixed to Product [x] Lithograph / Paper glued / Stenciled [ ] Other _____

Section - IV

1. Contact Point *(Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)*

Name	Title	Telephone No. (Include Area Code)
Ross Gilbert	Agent	(253) 853-7369

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowlingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

6. Date Application Received (Stamped)

2. Signature	3. Title
Gilbert	Agent
4. Typed Name	**5. Date**
Ross Gilbert	3/19/10.

EPA Form 8570-1 (Rev. 3-94) Previous editions are obsolete. White - EPA File Copy (original) Yellow - Applicant Copy

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

March 19, 2010

COURIER DELIVERY

Venus Eagle (PM 1)
Document Processing Desk (**NOTIF**)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

RE: Ensystex IV, Inc. – Prothor SC 0.5 (EPA Reg. No. 83923-3)
Revision to Container Disposal Instructions per PRN 2007-4

Dear Ms. Eagle,

On behalf of Ensystex IV, Inc. please find the enclosed label notification revising the container disposal instructions for Prothor SC 0.5 per PRN 2007-4.

In support of this notification submission, we submit the following documents:

1. Completed Application for Registration (EPA Form 8570-1)
2. One (1) copy of the Prothor SC 0.5 labeling with changes tracked
3. One (1) copy of the Prothor SC 0.5 labeling with changes incorporated
4. Certification with Respect to Label Integrity
5. One (1) copy of the Prothor SC 0.5 labeling on CD

Please feel free to contact me by phone (253) 853-7369 or by email at Ross@PyxisRC.com if you have any questions or need any additional information.

Sincerely,

Ross Gilbert

Enclosures

cc: D. Nimocks; Ensystex IV, Inc

Material to be added to an e-Jacket/Jacket

Reg. No. 83923-3

Description: _____

1. ☐ **Placement within the e-Jacket/jacket:**
   - ☐ **Default: (chronological, top = newest)**
   - ☐ **File Location: (PDF page number, i.e., "before page 45")**

     _____

     _____

2. ☐ **Send to Data Extraction contractors this material:**
   - ☐ **Newly stamped accepted label**
   - ☐ **Notification**
   - ☒ ~~**New**~~ **CSF** (Rejected)
   - ☐ **Other:** _____

3. Attach this coversheet to the top of the material or jacket. It must be well organized and clipped together, NOT STAPLED. Then give the material with this coversheet to staff in the Information Services Center (Room S-4900).

Reviewer's Name: Dan Daniel

Phone: 703 305-5409 **Division:** RD

Date: 11/24/09

Created August 19, 2008

November 24, 2009

Letter to the file:

EPA Registration Numbers

83923-1
83923-2
83923-3
83923-4
83923-5

Dani Daniel of the IRB branch contacted Ensystex IV, Inc. (Pyxis Regulatory Consulting, Inc.) representative; Michael Kellogg, advising him that the above mention csfs are deficient due to unapproved inerts and therefore, are not acceptable in accordance to the EPA guidelines. A copy of the Inert Clearance Status Form which lists all deficiencies has been sent to Mr. Kellogg with instructions to correct the alternate confidential statement of formulation and resubmit.

Please read instructions on reverse before completing form. Form Approved. OMB No. 2070-0060. Approval expires 2-28-95

United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☑ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number	2. EPA Product Manager	3. Proposed Classification
83923-3	V. Eagle	☑ None ☐ Restricted
4. Company/Product (Name)	**PM#**	
Ensystex IV, Inc. / Prothor SC 0.5	1	

5. Name and Address of Applicant *(Include ZIP Code)*
Ensystex IV, Inc.
c/o Pyxis Regulatory Consulting, Inc.
4110 136th St. NW
Gig Harbor, WA 98332
☐ *Check if this is a new address*

6. Expedited Reveiw. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to:
EPA Reg. No. _____
Product Name _____

Section - II

☑ Amendment - Explain below.
☐ Resubmission in response to Agency letter dated _____
☐ Notification - Explain below.
☐ Final printed labels in repsonse to Agency letter dated _____
☐ "Me Too" Application.
☐ Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Submission of an amendment to the Confidential Statement of Formula (Basic Formulation). As no data are being submitted with this amendment, nor will data need to be reviewed to approve the proposed amendment, Ensystex believes this action qualifies as a Fast Track amendment and is not subject to a Pesticide Registration Service Fee.

Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging	Unit Packaging	Water Soluble Packaging	2. Type of Container
☐ Yes ☑ No	☐ Yes ☑ No	☐ Yes ☑ No	☐ Metal ☑ Plastic ☐ Glass ☐ Paper ☐ Other (Specify) _____
* ***Certification must be submitted***	If "Yes" Unit Packaging wgt. / No. per container	If "Yes" Package wgt / No. per container	

3. Location of Net Contents Information	4. Size(s) Retail Container	5. Location of Label Directions
☑ Label ☑ Container	330 oz. (2.58 gallons)	☑ On Label ☐ On Labeling accompanying product

6. Manner in Which Label is Affixed to Product ☑ Lithograph Peper glued Stenciled ☐ Other _____

Section - IV

1. Contact Point *(Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)*

Name	Title	Telephone No. (Include Area Code)
Michael Kellogg	Agent	(253) 853-7369

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowlingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

6. Date Application Received (Stamped)

2. Signature	3. Title
Michael Kellogg	Agent
4. Typed Name	**5. Date**
Michael Kellogg	10/22/09

EPA Form 8570-1 (Rev. 3-94) Previous editions are obsolete. White - EPA File Copy (original) Yellow - Applicant Copy

INERT CLEARANCE STATUS FORM

Reviewer Name: Sandra Rock			Request date: 11/02/2009
Tel: 703-308-6164	RD/IIAB	CUBE: S-7982	MAIL CODE: 7505P

A. COMMENTS:

B. PESTICIDE PRODUCT INFORMATION:

Receipt Number: S-861145	Date on CSF: 10/22/2009	Food-Use Pesticide: [] Yes [x]No
EPA Reg. No/File Symbol: 83923-3	Formulation: Basic	
Product Name: Prothor SC 0.5		

C. INGREDIENT INFORMATION:

Ingredient No.1

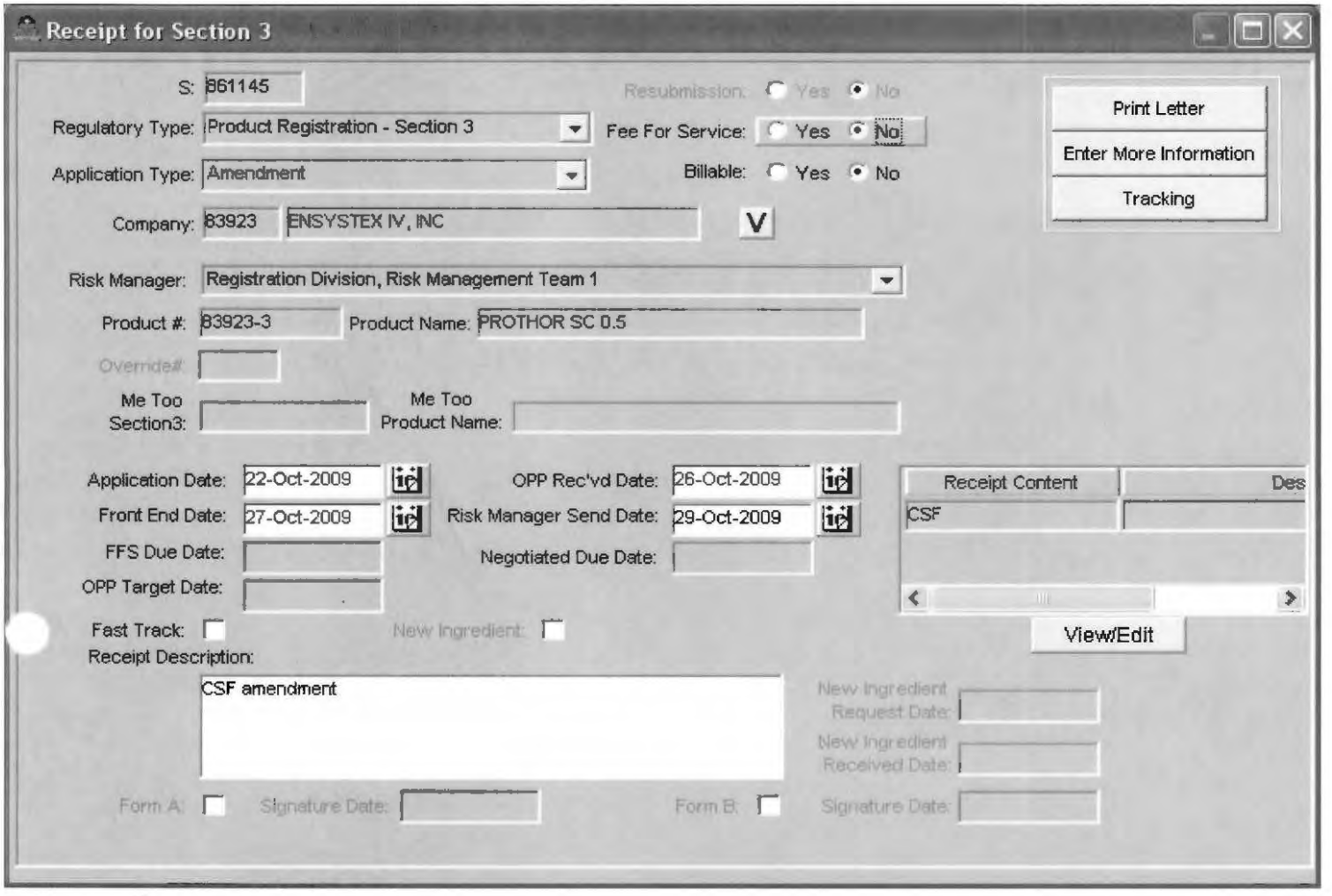
	Tolerance Exemption(s)[1] 910	920	930	940	950	960
Chem. Name						
Trade Name: [redacted]						
CAS Reg. No.:						
Comments: This trade product is not sufficiently identified by the MSDS provided. Please provide full compositional information including the manufacturer, trade name, constituent names, CAS numbers, and weight/weight percent composition (**100% full composition**).						

Ingredient No. 2

Chem. Name:						
Trade Name:						
CAS Reg. No.:						
Comments:						

Reviewer Name: Sandra Rock **Review Date: 11/02/2009**

[1] *Language from the Code of Federal Regulations (40 CFR 180, subpart D):*
40 CFR 180.910: Inert ingredients used pre- and post-harvest; 40 CFR 180.920: Inert ingredients used pre-harvest; 40 CFR 180.930: Inert ingredients applied to animals; 40 CFR 180.940: Tolerance exemptions for active and inert ingredients for use in antimicrobial formulations; 40 CFR 180.950: Tolerance exemptions for minimal risk active and inert ingredients; and 40 CFR 180.960: Polymers.



PM 1

I needs not approved.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

October 29, 2009

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

JANELLE KAY
PYXIS REGULATORY CONSULTING, INC.
ENSYSTEX IV, INC
4110 136TH STREET
GIG HARBOR, WA 98332-

PRODUCT NAME: PROTHOR SC 0.5
COMPANY NAME: ENSYSTEX IV, INC
OPP IDENTIFICATION NUMBER:
EPA FILE SYMBOL: 83923-3
EPA RECEIPT DATE: 10/26/09

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Registration Division, Risk Management Team 1, at (703) 308-8045.

Sincerely,

P. E. Moore
Front End Processing Staff
Information Services Branch
Information Technology & Resources Management Division

Fee for Service

{861145!~

This package includes the following

- ○ New Registration
- ◉ Amendment

□ Studies? □ Fee Waiver?

□ volpay % Reduction: ___

for Division

- ○ AD
- ○ BPPD
- ◉ RD

Risk Mgr. 1

Receipt No. S- 861145

EPA File Symbol/Reg. No. 83923-3

Pin-Punch Date: 10/26/2009

☑ This item is NOT subject to FFS action.

Action Code:

Requested:

Granted:

Amount Due: $ _____

Parent/Child Decisions:

Inerts not approved. See status form.
S. Rock 11/2/09

☐ Inert Cleared for Intended Use

☒ Uncleared Inert in Product

Reviewer: [signature] Date: 10/28/09

Remarks:

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

CONTAINS CONFIDENTIAL BUSINESS INFORMATION

October 22, 2009

COURIER DELIVERY

Venus Eagle (PM 1)
Document Processing Desk (**AMEND**)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202-4501

RE: Ensystex IV, Inc. – Prothor SC 0.5 (EPA Reg. No. 83923-3)
Amendment to the Confidential Statement of Formula (CSF)

Dear Ms. Eagle,

On behalf of Ensystex IV, Inc. please find the enclosed amendment to the Prothor SC 0.5 (Basic formulation). Ensystex IV, Inc. is requesting to add two (2) alternate inert ingredients and an additional source of inert ingredient as identified below:

[redacted]

In support of this amendment, we submit the following documents:

1. Copy of the cover letter with Confidential Business Information redacted
2. Completed Application for Amendment (EPA Form 8570-1)
3. Two (2) copies of the Confidential Statement of Formula (Basic formulation dated October 22, 2009)
4. MSDS sheets for the inert ingredients listed above

The Basic formulation CSF submitted with this amendment application is intended to **REPLACE** any previously approved Basic CSF's for Prothor SC 0.5.

As no data are being submitted with this amendment, nor will data need to be reviewed to approve the proposed amendment, Ensystex believes this action qualifies as a Fast Track amendment and is not subject to a Pesticide Registration Service Fee. Please feel free to call me if you have any questions or need any additional information.

Sincerely,

Michael Kellogg

Enclosures
cc: D. Nimocks; Ensystex IV, Inc.

Inert ingredient information may be entitled to confidential treatment

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

CONFIDENTIAL BUSINESS INFORMATION REDACTED

October 22, 2009

COURIER DELIVERY

Venus Eagle (PM 1)
Document Processing Desk (**AMEND**)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202-4501

RE: Ensystex IV, Inc. – Prothor SC 0.5 (EPA Reg. No. 83923-3)
Amendment to the Confidential Statement of Formula (CSF)

Dear Ms. Eagle,

On behalf of Ensystex IV, Inc. please find the enclosed amendment to the Prothor SC 0.5 (Basic formulation). Ensystex IV, Inc. is requesting to add two (2) alternate inert ingredients and an additional source of inert ingredient as identified below:

[redacted]

In support of this amendment, we submit the following documents:

1. Copy of the cover letter with Confidential Business Information redacted
2. Completed Application for Amendment (EPA Form 8570-1)
3. Two (2) copies of the Confidential Statement of Formula (Basic formulation dated October 22, 2009)
4. MSDS sheets for the inert ingredients listed above

The Basic formulation CSF submitted with this amendment application is intended to **REPLACE** any previously approved Basic CSF's for Prothor SC 0.5.

As no data are being submitted with this amendment, nor will data need to be reviewed to approve the proposed amendment, Ensystex believes this action qualifies as a Fast Track amendment and is not subject to a Pesticide Registration Service Fee. Please feel free to call me if you have any questions or need any additional information.

Sincerely,

Michael Kellogg

Enclosures
cc: D. Nimocks; Ensystex IV, Inc.

Material to be added to an e-Jacket/Jacket

Reg. No. 88923-3

Description: _____

1. ☐ Placement within the e-Jacket/jacket:
   - ☐ Default: (chronological, top = newest)
   - ☐ File Location: (PDF page number, i.e., "before page 45")

2. ☐ Send to Data Extraction contractors this material:
   - ☐ Newly stamped accepted label
   - ☐ Notification
   - ☐ New CSF
   - ☒ Other: Amended Basic CSF

3. Attach this coversheet to the top of the material or jacket. It must be well organized and clipped together, NOT STAPLED. Then give the material with this coversheet to staff in the Information Services Center (Room S-4900).

Reviewer's Name: Dan Daniel

Phone: 703 305-5905 Division: RD

Date: 09/15/05

Created August 19, 2008

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

SEP 15 2009

Mr. Michael Kellogg
Pyxis Regulatory Consulting, Inc.
4110 136th Street NW
Gig Harbor, WA 98332

Subject: The Addition of an Alternate Inert Source in the Basic CSF

Bithor SC GC	EPA Reg. No. 83923-1
Bithor SC	EPA Reg. No. 83923-2
Prothor SC 0.5	EPA Reg. No. 83923-3
Prothor SC 2	EPA Reg. No. 83923-4
Turfthor 2F	EPA Reg. No. 83923-5

Your Submission dates, August 20 & 24

Dear Mr. Kellogg:

The Agency has received and reviewed your Basic Confidential Statements of Formulation dated August 20 & 24, 2009. Your request for an additional source inert, identified as [redacted] is granted. The new confidential statement of formulation will become a part of the permanent record. If there are questions call me at 703 305-5409.

Sincerely,

/S/

Dani Daniel
Insecticide-Rodenticide Branch
Registration Division 7505P

Please read instructions on reverse before completing form. Form Approved. OMB No. 2070-0060. Approval expires 2-28-95

United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☑ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number	2. EPA Product Manager	3. Proposed Classification
83923-3	V. Eagle	☑ None ☐ Restricted
4. Company/Product (Name)	**PM#**	
Ensystex IV, Inc. / Prothor SC 0.5	1	

5. Name and Address of Applicant *(Include ZIP Code)*
Ensystex IV, Inc.
c/o Pyxis Regulatory Consulting, Inc.
4110 136th St. NW
Gig Harbor, WA 98332
☐ *Check if this is a new address*

6. Expedited Reveiw. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to:
EPA Reg. No. _____
Product Name _____

Section - II

☑ Amendment - Explain below.
☐ Resubmission in response to Agency letter dated _____
☐ Notification - Explain below.
☐ Final printed labels in repsonse to Agency letter dated _____
☐ "Me Too" Application.
☐ Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Submission of an amendment to the Confidential Statement of Formula (Basic Formulation). As no data are being submitted with this amendment, nor will data need to be reviewed to approve the proposed amendment, Ensystex believes this action qualifies as a Fast Track amendment and is not subject to a Pesticide Registration Service Fee.

Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging	Unit Packaging	Water Soluble Packaging	2. Type of Container
☐ Yes ☑ No	☐ Yes ☑ No	☐ Yes ☑ No	☐ Metal ☑ Plastic ☐ Glass ☐ Paper ☐ Other (Specify) _____
***Certification must be submitted**	If "Yes" Unit Packaging wgt. / No. per container	If "Yes" Package wgt / No. per container	

3. Location of Net Contents Information	4. Size(s) Retail Container	5. Location of Label Directions
☑ Label ☑ Container	330 oz. (2.58 gallons)	☑ On Label ☐ On Labeling accompanying product

6. Manner in Which Label is Affixed to Product ☑ Lithograph Paper glued Stenciled ☐ Other _____

Section - IV

1. Contact Point *(Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)*

Name	Title	Telephone No. (Include Area Code)
Michael Kellogg	Agent	(253) 853-7369

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowlingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

6. Date Application Received (Stamped)

2. Signature	3. Title
[signature]	Agent
4. Typed Name	**5. Date**
Michael Kellogg	8/20/09

EPA Form 8570-1 (Rev. 3-94) Previous editions are obsolete. White - EPA File Copy (original) Yellow - Applicant Copy

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

CONTAINS CONFIDENTIAL BUSINESS INFORMATION

August 20, 2009

COURIER DELIVERY

Venus Eagle (PM 1)
Document Processing Desk (**AMEND**)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202-4501

RE: Ensystex IV, Inc. – Prothor SC 0.5 (EPA Reg. No. 83923-3)
Amendment to the Confidential Statement of Formula (CSF)

Dear Ms. Eagle,

On behalf of Ensystex IV, Inc. please find the enclosed amendment to the Prothor SC 0.5 (Basic formulation). Ensystex IV is requesting to add an additional source of inert ingredient as identified below:

[redacted]

In support of this amendment, we submit the following documents:

1. Copy of the cover letter with Confidential Business Information redacted
2. Completed Application for Amendment (EPA Form 8570-1)
3. Two (2) copies of the Confidential Statement of Formula (Basic formulation dated August 20, 2009)
4. MSDS and technical specification sheet for the inert ingredient listed above

The Basic formulation CSF submitted with this amendment application is intended to **REPLACE** any previously approved Basic CSF's for Prothor SC 0.5.

As no data are being submitted with this amendment, nor will data need to be reviewed to approve the proposed amendment, Ensystex believes this action qualifies as a Fast Track amendment and is not subject to a Pesticide Registration Service Fee. Please feel free to call me if you have any questions or need any additional information.

Sincerely,

Michael Kellogg

Enclosures
cc: David Nimocks; Ensystex IV, Inc.

Inert ingredient information may be entitled to confidential treatment

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

August 26, 2009

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

JANELLE KAY
PYXIS REGULATORY CONSULTING, INC.
ENSYSTEX IV, INC
4110 136TH STREET
GIG HARBOR, WA 98332-

PRODUCT NAME: PROTHOR SC 0.5
COMPANY NAME: ENSYSTEX IV, INC
OPP IDENTIFICATION NUMBER:
EPA FILE SYMBOL: 83923-3
EPA RECEIPT DATE: 08/25/09

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Registration Division, Risk Management Team 1, at (703) 308-8045.

Sincerely,

P. K. Mosse
Front End Processing Staff
Information Services Branch
Information Technology & Resources Management Division

Fee for Service

pem 15
{856563<~

This package includes the following

- ○ New Registration
- ◉ Amendment

□ Studies? □ Fee Waiver?

□ volpay % Reduction: ___

for Division

- ○ AD
- ○ BPPD
- ◉ RD

Risk Mgr. 1

Receipt No. S-	856563
EPA File Symbol/Reg. No.	83923-3
Pin-Punch Date:	8/25/2009

☒ This item is NOT subject to FFS action.

Action Code:

Requested:

Granted:

Amount Due: $ _____

Inerts approved.

Parent/Child Decisions:

☒ Inert Cleared for Intended Use

☐ Uncleared Inert in Product

Reviewer: Venus Eagle Date: 8/24/09

Remarks:

IRB/PM 1

FAST-TRACK AMENDMENTS–Completeness Screening Checklist

Experts In-Processing Signature: MiWAZSA

EPA Reg. Number: 83923-3	EPA Receipt Date: 8/25/09			
	Check List Item	Yes	No	NA
1	**Application Form** (EPA Form 8570-1) –signed?	X		
2	**Confidential Statement of Formula** (EPA Form 8570-29) – signed?	X		
3	**Certification with Respect to Citation of Data** (EPA Form 8570-34) signed?			X
4	**Formulator's Exemption Statement** (EPA Form 8570-27) - signed?			X
5	**Data Matrix** (EPA Form 8570-35) [Applicable, for adding me-too uses]			X
	a) Selective Method?			
	b) Cite-All Method? Applicant owns data or list only the companies offered to pay			
	c) Public copy of Matrix provided? See PR Notice 98-5			
6	**Is Label Included? (5 copies)**			X
	Comments: CSF Amendment, Inerts approved.			

Material to be added to an e-Jacket/Jacket

Reg. No. 83923-3

Description: _____

1. ☐ **Placement within the e-Jacket/jacket:**
   - ☐ **Default: (chronological, top = newest)**
   - ☐ **File Location: (PDF page number, i.e., "before page 45")**

2. ☐ **Send to Data Extraction contractors this material:**
   - ☐ **Newly stamped accepted label**
   - ☐ **Notification**
   - ☐ **New CSF**
   - ☒ **Other:** Conditional Registration Letter

3. Attach this coversheet to the top of the material or jacket. It must be well organized and clipped together, NOT STAPLED. Then give the material with this coversheet to staff in the Information Services Center (Room S-4900).

Reviewer's Name: Sam Samel

Phone: 703 305-5409 **Division:** RD

Date: 11/24/08

Created August 19, 2008

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Mr. Michael Kellogg
Etigra LLC
c/o Pyxis Regulatory Consulting, Inc.
4110 136th Street, NW
Gig Harbor, WA 98332

Subject: Submission of Storage Stability and Corrosion Characteristics Studies
Prothor SC 0.5
EPA Reg. No. 83923-3
Your Submission date, October 20, 2007

Dear Mr. Kellogg:

The Agency has received and reviewed the requested above mentioned studies. The studies are acceptable and your requirement for the registration of the above product is complete. Thank you for your prompt completion of the data for this section 3 registration. If there are questions call me at 703 305-5409.

Sincerely,

Dani Daniel
Insecticide-Rodenticide Branch
Registration Division 7505P

Please read instructions on reverse before completing form. Form Approved. OMB No. 2070-0060. Approval expires 2-28-95

United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☑ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number	2. EPA Product Manager	3. Proposed Classification
83923-3	V. Eagle	☑ None ☐ Restricted
4. Company/Product (Name)	**PM#**	
Ensystex IV, Inc. / Prothor SC 0.5	01	

5. Name and Address of Applicant *(Include ZIP Code)*
Ensystex IV, Inc.
c/o Pyxis Regulatory Consulting, Inc.
4110 136th St. NW
Gig Harbor, WA 98332
☐ *Check if this is a new address*

6. Expedited Reveiw. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to:
EPA Reg. No. _____
Product Name _____

Section - II

☐ Amendment - Explain below.
☑ Resubmission in response to Agency letter dated 3/6/2007
☐ Notification - Explain below.
☐ Final printed labels in reponse to Agency letter dated _____
☐ "Me Too" Application.
☐ Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)
Submission of storage stability and corrosion characteristics study per the Agency letter dated March 6, 2007.

Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging	Unit Packaging	Water Soluble Packaging	2. Type of Container
☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Metal ☐ Plastic ☐ Glass ☐ Paper ☐ Other (Specify)
***Certification must be submitted**	If "Yes" Unit Packaging wgt. / No. per container	If "Yes" Package wgt / No. per container	

3. Location of Net Contents Information	4. Size(s) Retail Container	5. Location of Label Directions
☐ Label ☐ Container		☐ On Label ☐ On Labeling accompanying product

6. Manner in Which Label is Affixed to Product ☐ Lithograph ☐ Paper glued ☐ Stenciled ☐ Other _____

Section - IV

1. Contact Point *(Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)*

Name	Title	Telephone No. (Include Area Code)
Michael Kellogg	Agent	253-853-7369

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowlingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

6. Date Application Received (Stamped)

2. Signature	3. Title
Michael Kellogg	Agent
4. Typed Name	**5. Date**
Michael Kellogg	9/20/07

EPA Form 8570-1 (Rev. 3-94) Previous editions are obsolete. White - EPA File Copy (original) Yellow - Applicant Copy

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

472375-00

September 20, 2007

COURIER DELIVERY

Venus Eagle (PM 01)
Document Processing Desk (AMEND)
Office of Pesticide Programs
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202-4501

RE: Ensystex IV, Inc. – Prothor SC 0.5 (EPA File Symbol No. 83923-3)
Submission of Storage Stability and Corrosion Characteristic study per the Agency letter dated March 6, 2007

Dear Ms. Eagle,

On behalf of Ensystex IV, Inc. and in response to the Agency letter dated March 6, 2007, please find the enclosed storage stability and corrosion characteristics study for Prothor SC 0.5 (EPA Reg. No. 83923-3).

In support of this submission, please find the enclosed:

1. Completed Application for Registration (EPA Form 8570-1)
2. Product Specific Chemistry Data (3 copies):

47237501	Volume 1	830.6317; 830.6320	Wo, C., Prothor SC 0.5, Storage Stability and Corrosion Characteristics.

Please feel free to contact me if you have any questions or need any additional information.

Sincerely,

Michael Kellogg

Enclosures

PYXI .EGULATORY CONSULTING, .IC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

February 19, 2008

COURIER DELIVERY

Venus Eagle (PM 01)
Document Processing Desk (**FNL LBL**)
Office of Pesticide Programs
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202-4501

RE: Ensystex IV, Inc. – Prothor SC 0.5 (EPA File Symbol No. 83923-3)
Submission of Final Product Labeling per the Agency Letter dated March 15, 2007

Dear Ms. Eagle,

On behalf of Ensystex IV, please find the enclosed final labeling for Prothor SC 0.5 (EPA Reg. No. 83923-3) per the Agency letter dated March 15, 2007.

In support of this submission, enclosed please find the following documents:

1. Application for Pesticide Registration (EPA Form 8570-1)
2. One (1) copy of the Prothor SC 0.5 final label

Please feel free to contact me if you have any questions or need any additional information.

Sincerely,

Michael Kellogg

Enclosures

Please read instructions on reverse before comple[illegible] form. Form Approved. [illegible]MB No. 2070-0060. Approval expires 2-28-95

United States
Environmental Protection Agency
Washington, DC 20460

- [ ] Registration
- [ ] Amendment
- [x] Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number	2. EPA Product Manager	3. Proposed Classification
83293-3	V. Eagle	[x] None [ ] Restricted
4. Company/Product (Name)	**PM#**	
Ensystex IV, Inc. / Prothor SC 0.5	01	

5. Name and Address of Applicant *(Include ZIP Code)*
Ensystex IV, Inc.
c/o Pyxis Regulatory Consulting, Inc.
4110 136th St. NW
Gig Harbor, WA 98332
[ ] *Check if this is a new address*

6. Expedited Reveiw. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to:
EPA Reg. No. _____
Product Name _____

Section - II

- [ ] Amendment - Explain below.
- [ ] Resubmission in response to Agency letter dated _____
- [ ] Notification - Explain below.
- [x] Final printed labels in reponse to Agency letter dated March 15, 2007
- [ ] "Me Too" Application.
- [ ] Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)
Submission of final product label per the Agency letter dated March 15, 2007.

Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging	Unit Packaging	Water Soluble Packaging	2. Type of Container
[ ] Yes [ ] No	[ ] Yes [ ] No	[ ] Yes [ ] No	[ ] Metal [ ] Plastic [ ] Glass [ ] Paper [ ] Other (Specify) _____
* *Certification must be submitted*	If "Yes" Unit Packaging wgt. / No. per container	If "Yes" Package wgt / No. per container	

3. Location of Net Contents Information	4. Size(s) Retail Container	5. Location of Label Directions
[ ] Label [ ] Container		[ ] On Label [ ] On Labeling accompanying product

6. Manner in Which Label is Affixed to Product [ ] Lithograph [ ] Paper glued [ ] Stenciled [ ] Other _____

Section - IV

1. Contact Point *(Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)*

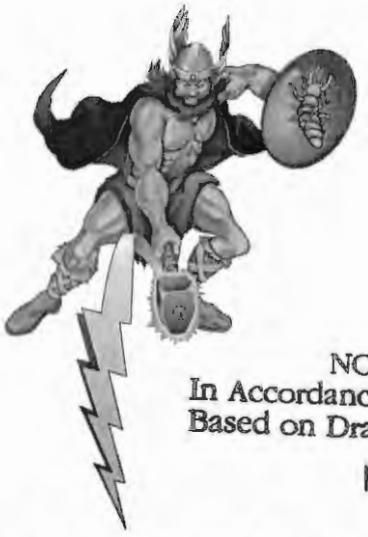
Name	Title	Telephone No. (Include Area Code)
Michael Kellogg	Agent	(253) 853-7369

Certification
I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowlingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

6. Date Application Received (Stamped)

2. Signature	3. Title	5. Date
Michael Kellogg	Agent	2/19/08
4. Typed Name: Michael Kellogg		

EPA Form 8570-1 (Rev. 3-94) Previous editions are obsolete. White - EPA File Copy (original) Yellow - Applicant Copy



NOT REVIEWED
In Accordance with PR Notice 82-2
Based on Draft Labeling Dated
MAR 15 2007

PROTHOR SC 0.5

For use only by individuals/firms licensed or registered by the state to apply termiticide products. ıtes may have more restrictive requirements regarding qualifications of persons using this product. Consult the structural pest control regulatory agency of your state prior to use of this product.

For prevention or control of subterranean termites in and around residential, commercial, industrial, institutional and public structures and buildings.

Active Ingredient:	By Wt.
Imidacloprid	5.65%
Other Ingredients:	94.35%
TOTAL:	100.0%

Contains 0.5 pounds of imidacloprid per gallon

Shake well before using

EPA Reg. No. 83923-3 EPA Est. 81824-NC-001

STOP – Read the label before use

KEEP OUT OF REACH OF CHILDREN

CAUTION

(PRECAUCION AL USUARIO: Si usted no puede leer o entender ingles, no use este producto hasta que la etiqueta le haya sido explicada ampliamente.)

(TO THE USER: If you cannot read and understand English, do not use this product until the label has been fully explained to you.)

For product use information call 1-866-FOR-THOR (367-8467) or visit www.for-thor.com.

NET CONTENTS: As marked on container

Manufactured by:

ENSYSTEX IV, Inc.

Fayetteville, NC 28303

FIRST AID	
If swallowed	• Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by a poison control center or doctor. • Do not give anything by mouth to an unconscious person.
If on skin or clothing	• Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15 to 20 minutes. • Call a poison control center or doctor for treatment advice.
If in eyes	• Hold eye open and rise slowly and gently with water for 15 to 20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.

HOTLINE NUMBER

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contect 1-866-367-8467 for emergency medical treatment information.

NOTE TO PHYSICIAN

No specific antidote is available. Treat the patient symptomatically.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION

Harmful if swallowed, inhaled or absorbed through skin. Causes eye irritation. Avoid contact with skin, eyes or clothing. Avoid breathing dust or vapor. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing and wash before reuse. Keep children and pets away from treated area until dry.

Personal Protective Equipment: All pesticide handlers (mixers, loaders and applicators) must wear long-sleeved shirt and long pants, socks, shoes and chemical-resistant gloves made of waterproof material such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, polyethylene, polyvinyl chloride or viton. After the product is diluted in accordance with label directions for use, shirt, pants, socks and chemical-resistant gloves are sufficient protection. All pesticide handlers must wear protective eyewear, such as goggles, faceshield or safety glasses, when working in a non-ventilated space or when applying as a termiticide by rodding or sub-slab injection.

Termite Control Treatment: When treating adjacent to an existing structure, the applicator must check the area to be treated and immediately adjacent areas of the structure for visible and accessible cracks and holes to prevent any leaks or significant exposures to persons occupying the structure. People present or residing in the structure during application must be advised to remove their pets and themselves from the structure if they see any signs of leakage. After application, the applicator is required to check for leaks. All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site. Do not allow people or pets to contact contaminated areas or to reoccupy contaminated areas of the structure until the cleanup is completed.

Environmental Hazards

This pesticide is highly toxic to aquatic invertebrates. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters. Apply this product only as specified on this label. Extreme care must be taken to avoid runoff. Apply only to soil or other fill substrate that will accept the solution at the specified rate. Do not treat soil that is water-saturated or frozen or in any conditions where run-off or movement from the treated area (site) is likely to occur.

Physical and Chemical Hazards

Do not apply this product or solutions of this product around electrical equipment, such as electrical conduits, motor housings, junction boxes, switch boxes, etc. due to the possibility of shock hazard.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Keep out of reach of children and animals. Store in original containers only. Store in a cool, dry place and avoid excess heat. Handle and open container in a manner so as to prevent spillage. Do not put concentrate or dilute material into food or drink containers. Preferably store in a locked area.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site (in the treatment area) or at an approved waste disposal facility.

Container Disposal: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or by incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

In Case of Spill: Confine it, avoid contact, isolate area and keep animals and unprotected persons away. If spill is liquid, form dike around spill area and/or absorb spill with absorbent materials, such as sand, cat litter or clay. If spill is dry powder only, sweep material into a suitable container. Place damaged package in a holding container and identify contents. Contact Ensystex IV at 1-866-367-8467 or Chemtrec at 1-800-424-9300 for any assistance.

APPLICATION FOR CONTROL OF SUBTERRANEAN TERMITES

General

PROTHOR SC 0.5, in the form of a dilute insecticidal solution, prevents and controls subterranean termite infestations in and around structures and other items by creating a continuous chemically treated zone (horizontal and/or vertical as needed) between the wood and other cellulose material in a structure and termite colonies in the soil. In order to establish a zone between the wood in the structure and the termites in the soil, adequately disperse the solution of this product in the soil.

To effectively control subterranean termites with this product, the service technician should be familiar with current subterranean termite control practices including trenching, rodding, sub-slab and void injection, soil surface fan spraying and excavated soil treatment. Correct use of these techniques is necessary to effectively control infestations by subterranean termites such as *Coptotermes, Heterotermes and Reticulitermes*. The service technician should consider the biology and behavior of the termite specie(s) to be controlled to determine which control practices to use.

Treatment standards and procedures for subterranean termite control may vary due to regulations, water table level, structure design, soil types, construction practices and other factors. For advice concerning current control practices with respect to specific local conditions, consult resources in structural pest control and state cooperative extension and regulatory agencies. Follow all federal, state and local regulations and treatment standards for protection of a structure from subterranean termites.

Effective termite control may also include mechanical alteration of the structure. Elimination of leaks or points of moisture accumulation within or on the exterior of the structure that result in an increase in the moisture content of wooden structural components is advised. Removal of non-essential cellulose containing materials that are in contact with the ground under or around the structure can reduce termite foraging in the area.

PROTHOR SC 0.5 is labeled for use against subterranean termites as a 0.05% to 0.10% solution in water. Generally, the 0.05% rate is used for typical control situations. When severe or persistent infestations are occurring, a 0.10% solution may be more appropriate. When difficult or problem soils or construction types are encountered, it may be necessary to use 0.10% PROTHOR SC 0.5 mixed in reduced volumes of water.

Avoid contamination of water supplies due to backflow under reduced water system pressure by using anti-backflow equipment or procedures to prevent siphoning of any solution back into a water supply. Do not contaminate cisterns or wells. Do not treat soil that is water saturated or frozen. Do not treat while precipitation is occurring. Do not apply solution to an area or site if the soil at the area or site is in such a state or condition that runoff or movement of the solution from the treated area or site is likely to occur. Structures that contain wells or cisterns within the foundation of the structure can only be treated using the treated backfill method described in the treatment around wells and cisterns section of this label. Consult state and local specifications for recommended distances of wells from treated areas, or if such regulations do not exist, refer to Federal Housing Administration Specifications (H.U.D.) for guidance.

Dilution and Mixing of PROTHOR SC 0.5

Use rates for PROTHOR SC 0.5 are expressed and the solution is mixed according to the percentage (%) concentration it forms when mixed in water. Use the *Mixing Table for PROTHOR SC 0.5* or alternately the formulas below to determine the amount of PROTHOR SC 0.5 to add to any quantity of water.

To mix, measure out the required amount of PROTHOR SC 0.5 according to the *Mixing Table for PROTHOR SC 0.5*. Pour this amount of PROTHOR SC 0.5 into the spray tank as it is being filled with water with the agitator operating.

Mix PROTHOR SC 0.5 to create a use dilution in the following manner:

1. Fill tank 1/4 to 1/3 full.
2. Start pump to begin by-pass agitation and place end of treating tool in tank to allow circulation through hose.
3. Add appropriate amount of PROTHOR SC 0.5.
4. Add remaining amount of water.
5. Let pump run and allow recirculation through the hose for 2 to 3 minutes."

Prothor SC may also be mixed into full tanks of water, but substantial agitation is required to ensure uniformity of the solution.

Mixing Table for PROTHOR SC 0.5

Solution Percentage Concentration Desired	Gallons of Finished Solution Desired	Fluid Ounces of PROTHOR SC 0.5 to add
0.05%	25	27.5
	50	55.0
	100	110.0
0.10%	25	55.0
	50	110.0
	100	220.0

Calculating an Amount of PROTHOR SC 0.5 to Mix

To mix any amount of PROTHOR SC 0.5 determine:

A = Gallons of water into which PROTHOR SC 0.5 will be mixed. Express any partial gallons as decimal fractions (1/2 = .5).

Fluid ounces of PROTHOR SC 0.5 to add to A gallons for 0.05% = A x 1.1

Fluid ounces of PROTHOR SC 0.5 to add to A gallons for 0.10% = A x 2.2

Proportional Injector Mixing Table For PROTHOR SC 0.5

Solution Percentage Concentration Desired	Injector Volume (fluid ounces per gallon)
0.05%	1.10
0.10%	2.20

Application Volume

To provide maximum control and protection against termite infestation, apply the specified volume of the finished water solution containing the specified amount of PROTHOR SC 0.5 as set out below or as otherwise directed in this label.

Prescribed Horizontal Barrier Rate: Unless otherwise directed, horizontal barriers are created by applying a 0.05% to 0.10% solution at a rate of one gallon of solution per 10 square feet.

Prescribed Vertical Barrier Rate: Unless otherwise directed, vertical barriers are created by applying a 0.05% to 0.10% solution at a rate of four gallons of solution per 10 linear feet per foot of depth.

Adjustments to Application Volume

If soil will not accept the labeled application volumes, the volume may be reduced provided there is a corresponding increase in concentration so that the amount of active ingredient applied to the soil remains the same.

Note: Large reductions of application volume reduce the likelihood of obtaining a continuous barrier. Variance is allowed when volume and concentration are consistent with label directed rates and a continuous barrier can still be achieved. When volume is reduced, the spacing of holes created for sub slab injection and soil rodding may need to be reduced to account for decreased dispersion of the solution in the soil.

For example, adjust the amount of solution applied to deliver a horizontal barrier of 10 square feet from 1 gallon to as low as 0.5 gallons and as high as 2 gallons while maintaining the amount of PROTHOR SC 0.5 applied per 10 square feet.

For example, adjust the amount of solution applied to deliver a vertical barrier 10 feet long by one foot deep from 4 gallons to as low as 2 gallons and as high as 8 gallons while maintaining the amount of PROTHOR SC 0.5 applied per 10 linear feet.

PRE-CONSTRUCTION TREATMENT

All Structures

Do not apply at a lower dosage and/or concentration than specified on this label for applications prior to the installation of the finished grade.

Prior to each application, applicators must notify the general contractor, construction superintendent, or similar responsible party, of the intended termiticide application and intended sites of application and instruct the responsible person to notify construction workers and other individuals to leave the area to be treated during application and until the termiticide is absorbed into the soil.

Concrete Slab On Ground or Basements

Apply an overall treatment to the entire surface of soil or other substrate to be covered by the slab including areas to be under carports, porches, basement floors and entrance platforms. Apply solution uniformly at the Prescribed Horizontal Barrier Rate. If fill under slab is gravel or other coarse aggregate, apply at the rate of 1.5 gallons per 10 square feet or sufficient volume of solution to uniformly cover each 10 square feet. To provide a uniform treated zone in soil at critical areas such as along the inside of foundation walls, and around plumbing, bath traps, utility services, and other features that will penetrate the slab, apply solution at the Prescribed Vertical Barrier Rate to these areas.

After completion of grading, make an application by trenching or trenching and rodding around the slab or foundation perimeter and applying solution at the Prescribed Vertical Barrier Rate. Rodding may be done from the bottom of a shallow trench. When rodding, rod holes must be spaced in a manner that will allow for a continuous chemical treated zone to be deposited along the treated area (place holes 12 or fewer inches apart). Rod holes should not extend below the footing. When trenching, the trench along the outside foundation should be about 6 inches in width and 6 inches in depth. Use a low pressure spray (not to exceed 25 PSI at the treatment tool when the valve is open) to treat the soil which will be placed into the trench after rodding. Mix the spray solution with soil as it is being placed in the trench. When treating voids in hollow masonry units, apply 2 gallons of solution per 10 linear feet of wall. Apply solution so it will reach the footing by injecting into the lower areas of the wall, just above the floor or footing.

When treating foundations deeper than 4 feet, apply the termiticide as the backfill is being replaced, or if the construction contractor fails to notify the applicator to permit this, treat the foundation to a minimum depth of 4 feet after the backfill has been installed. The applicator must trench and rod into the trench or trench along the foundation walls and around pillars and other foundation elements and treat the soil at the Prescribed Vertical Barrier Rate from grade to a minimum depth of 4 feet. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. However, in no case should a structure be treated below the footing. Rodding in trench followed by flooding of trench and treatment of backfill may provide a better chance of achieving a continuous treated zone than using soil rodding alone to establish a vertical treated zone.

Crawl Spaces

Application must be made by trenching or trenching and rodding downward along the inside and outside of foundation walls, around piers, interior supports in contact with the soil, plumbing, and utility services at the Prescribed Vertical Barrier Rate. Rodding may be done from the bottom of a shallow trench to the top of the footing or a minimum of 4 feet. When rodding, rod holes must be spaced in a manner that will allow for a continuous treated zone to be deposited along the treated area. Rod holes should not extend below the footing. When trenching, the trench should be about 6 inches wide and 6 inches deep. Use a low pressure spray to treat soil which will be placed in the trench, mixing the spray solution with soil as it is being placed in the trench.

Hollow Block Foundations and Voids

Hollow block foundations or voids in masonry resting on the footing may be treated to create a continuously treated zone in the voids at the footing. Apply 2 gallons of solution per 10 linear feet to the lower part of the void so that it reaches the top of the footing or soil. Treatment of voids in block or rubble foundation walls must be closely examined. Applicators must inspect areas of possible runoff as a precaution against application leakage in the treated areas. Some areas may not be treatable or may require mechanical alteration prior to treatment. All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site (refer to Precautionary Statements). Do not allow people or pets to contact or to reoccupy the contaminated areas of the structure until the clean up is completed.

POST CONSTRUCTION TREATMENT

All Structures

Do not apply treatment until the identity and location of all wells, radiant heat pipes, water and sewer lines, electrical conduits and sub-slab heating and air conditioning ducts is established. Caution must be taken to avoid puncturing these elements and/or injecting solution into them. All holes in commonly occupied areas into which material has been applied must be plugged. Plugs must be of a non-cellulose material or covered by an impervious, non-cellulose material.

Vertical Barrier Depth: For applications made after the final grade is installed, the applicator must trench and rod into the trench or trench along the foundation walls and around pillars and other foundation elements and treat at the rate prescribed from grade to the top of the footing. When the footing is more than four (4) feet below grade, the applicator must trench and rod into the trench or trench along the foundation walls and treat at the rate prescribed to a minimum depth of four feet. The actual depth of treatment will vary depending on the soil type, degree of compaction, and location of termite activity. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. However, in no case should a structure be treated below the footing.

Structures Containing Concrete Slabs on Ground (Monolithic/Floating/Supported) Including Basements

To make an application beneath existing slabs, it may be necessary to drill holes in the slab or adjacent foundation and to apply solution. Holes should be spaced such that when treatment is applied through them, a continuous treated zone is applied beneath the slab.

Treat all existing cracks and cold, construction or expansion joints. Also, treat around bath traps, plumbing and utility services which penetrate the slab. Apply 4 gallons per 10 lineal feet per foot of depth to provide a uniform treated zone.

Vertical Barriers Along Exterior of Foundation Walls: Trench and rod into the trench or trench along the outside of foundation walls and treat at the Prescribed Vertical Barrier Rate to the depth specified under Vertical Barrier Depth. Where physical obstructions such as concrete walkways adjacent to foundation elements or soil type and/or conditions make trenching prohibitive, treatment may be made by rodding alone.

Vertical Barriers Along Interior of Foundation Walls: Vertical barriers may be established on the interior side of foundation walls by sub-slab injection of the solution at the Prescribed Vertical Barrier Rate. Injection openings can be drilled either vertically through the slab along the interior of the foundation wall or horizontally from the exterior through the foundation wall low enough on the wall to allow for the deposition of the solution beneath the slab along the interior side of the foundation wall. Drill holes should be spaced so as to achieve a continuous chemical barrier but in no case farther apart than 12 inches. Special care must be taken to distribute the solution evenly. Vertical barriers may also be established beneath the slab along both sides of interior footing-supported walls, one side of interior partitions and along all cracks and expansion joints and utility service entrances and bath traps.

Horizontal Barriers Beneath Slabs on Ground: Create a horizontal barrier by treating at the Prescribed Horizontal Barrier Rate beneath slabs by either drilling and long rodding from the exterior or by grid pattern drilling and injection vertically through the slab. Long rodding should be used only when grid pattern drilling and injection and horizontal short rodding and injection cannot be used to deliver the sub slab treatment.

Bath Traps: Exposed soil beneath and around areas where plumbing and utility services penetrate the slab should be treated at the rate of 3 gallons of solution per square foot of soil.

Structures Containing Accessible Crawl Spaces

For crawl spaces, including sealed underfloor spaces that serve as heating and air conditioning plenums, apply vertical termiticide barriers at the rate of 4 gallons of solution per 10 linear feet per foot of depth from grade to the top of the footing, or if the footing is more than 4 feet below grade, to a minimum depth of 4 feet. Apply by trenching and rodding into the trench, or trenching. Treat both sides of foundation and around all piers and pipes. Where physical obstructions such as concrete walkways adjacent to foundation elements prevent trenching, treatment may be made by rodding alone. When soil type and/or conditions make trenching prohibitive, rodding may be used. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. Read and follow the mixing and use direction section of the label if situations are encountered where the soil will not accept the full application volume.

1. Rod holes and trenches must not extend below the bottom of the footing.

2. Rod holes must be spaced so as to achieve a continuous termiticide barrier but in no case more than 12 inches apart.

3. Trenches must be a minimum of 6 inches deep or to the bottom of the footing, whichever is less, and need not be wider than 6 inches. When trenching in sloping (tiered) soil, the trench must be stepped to ensure adequate distribution and to prevent termiticide from running off. The solution must be mixed with the soil as it is replaced in the trench.

4. When treating crawl spaces used as plenums, turn off the air circulation system of the structure until application has been completed and all solution has been absorbed by the soil.

Subterranean termites can be prevented from constructing shelter tubes directly between the crawl space soil surface and overhead crawl space wooden members by the application of an overall treatment of the crawl space soil surface at the Prescribed Horizontal Barrier Rate using a 0.05% to 0.10% solution of PROTHOR SC 0.5.

PROTHOR SC 0.5 can be applied as a general fan spray within crawl spaces directly to swarming and exposed worker termites at the Prescribed Horizontal Barrier Rate using a 0.05% to 0.10% solution of PROTHOR SC 0.5.

Note: Overall treatments (treatments where chemical is applied more than 18 inches from the foundation walls, piers and pipes) should not be applied within a crawl space that serves as a plenum.

ctures Containing Inaccessible Crawl Spaces

For inaccessible interior areas, such as areas where there is insufficient clearance between floor joists and ground surfaces to allow operator access, excavate, if possible, and treat according to the instructions for accessible crawl spaces. Otherwise, apply one, or a combination of the following two methods.

1. To establish a horizontal barrier, apply to the soil surface, 1 gallon of solution per 10 square feet overall using a nozzle pressure of less than 25 p.s.i. and a coarse application nozzle (e.g., Delavan Type RD Raindrop, RD-7 or larger, or Spraying Systems Co. 8010LP TeeJet or comparable nozzle). For an area that cannot be reached with the application wand, use one or more extension rods to make the application to the soil. Do not broadcast or power spray with higher pressures.

2. To establish a horizontal barrier, drill through the foundation wall or through the floor above and treat the soil perimeter at a rate of 1 gallon of solution per 10 square feet. Drill spacing must be at intervals not to exceed 16 inches. Many states have smaller intervals, so check state regulations which may apply.

When treating crawl spaces used as plenums, turn off the air circulation system of the structure until application has been completed and all termiticide has been absorbed by the soil.

Note: Overall treatments (treatments where chemical is applied more than 18 inches from the foundation walls, piers and pipes) should not be applied within a crawl space that serves as a plenum.

Masonry Voids

Drill and treat voids in multiple masonry elements of the structure extending from the structure to the soil in order to create a continuous treatment barrier in the area to be treated. Apply at the rate of 2 gallons of solution per 10 linear feet of footing using a nozzle pressure of less than 25 p.s.i. When using this treatment access holes must be drilled below the sill plate and should be as close as possible to the footing as is practical. Treatment of voids in block or rubble foundation walls must be closely examined: Applicators must inspect areas of possible runoff as a precaution against application leakage in the treated areas. Some areas may not be treatable or may require mechanical alteration prior to treatment.

All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site. Do not allow people or pets to contact contaminated areas or to reoccupy the contaminated areas of the structure until the clean-up is completed.

Note: When drilling veneer walls, care should be taken to not drill beyond the depth of the void behind the veneer into another construction layer behind the veneer. It is however permissible to drill through the veneer and into concrete blocks behind the veneer and to treat the veneer and the concrete blocks at the same time.

Note: Not for use in voids insulated with rigid foam.

TREATMENT OF STRUCTURES WITH WELLS AND CISTERNS

Do not contaminate wells or cisterns.

Structures with Wells/Cisterns Inside Foundations

Structures that contain wells or cisterns within the foundation of a structure can only be treated using the following techniques:

Do not treat soil while it is beneath or within the foundation or along the exterior perimeter of a structure that contains a well or cistern. The treated backfill method must be used if soil is removed and treated outside/away from the foundation. The treated backfill technique is described as follows:

a. Trench and remove soil to be treated onto heavy plastic sheeting or similar material or into a wheelbarrow.

b. Treat the soil at the rate of 4 gallons of dilute solution per 10 linear feet per foot of depth of the trench, or 1 gallon per 1.0 cubic feet of soil. See *Mixing Directions for PROTHOR SC 0.5 for Use as a Termiticide* section of the label. Mix thoroughly into the soil taking care to contain the liquid and prevent runoff or spillage.

c. After the treated soil has absorbed the solution, replace the soil into the trench.

Structures with Adjacent Wells/Cisterns and/or Other Water Bodies

Applicators must inspect all structures with nearby water sources such as wells, cisterns, surface ponds, streams, and other bodies of water and evaluate, at a minimum, the treatment recommendations listed below prior to making an application.

1. Prior to treatment, if feasible, expose the water pipe(s) coming from a well to the structure, if the pipe(s) enter the structure within 3 feet of grade.

2. Prior to treatment, applicators are advised to take precautions to limit the risk of applying the termiticide into subsurface drains that could empty into any bodies of water. These precautions include evaluating whether application of the termiticide to the top of the footer may result in contamination of the subsurface drain. Factors such as depth to the drain system and soil type and degree of compaction should be taken into account in determining the depth of treatment.

3. When appropriate (for example, on the water side of the structure), the treated backfill technique (described above) can also be used to minimize offsite movement of termiticide.

FOAM APPLICATION

PROTHOR SC 0.5, in the form of a foam, can be used to deliver PROTHOR SC 0.5 as a termiticide any time it appears likely this form of delivery will improve the dispersal of PROTHOR SC 0.5 into and within the intended target area. Construction practices, soil subsidence and other factors may create situations in which a continuous treated zone cannot be achieved using conventional treatment alone. In these situations or wherever else it becomes necessary, conventional application methods can be supplemented through the use of foam (created by the use of foam generating equipment, or similar devices) to create a continuous treated zone. Foam can be particularly useful to deliver PROTHOR SC 0.5 where it either cannot be depended upon to be delivered as just a solution or due to a need to reduce the amount of water used in order to avoid water damage to the target or adjacent areas.

Depending on the circumstances, foam applications of PROTHOR SC 0.5 may be used alone or in combination with liquid solution applications, provided that the cumulative amount of active ingredient applied per unit of area is equivalent to that which would be applied according to a solution-only application at the recommended rate. At least 75% of the gallons of PROTHOR SC 0.5 must be applied as a typical liquid treatment. The remaining 25% or less gallons can be delivered to appropriate locations using a foam application. The application of the correct volume and amount of active ingredient are essential to the application of an effective treatment.

Foam Mixing Instructions

27.5 ounces of PROTHOR SC 0.5 can be mixed with between 1 and 5 gallons of water and expanded to create 25 gallons of foam containing 0.05% active ingredient. 55.0 ounces of PROTHOR SC 0.5 can be mixed with between 1 and 5 gallons of water and expanded to create 50 gallons of foam containing 0.05% active ingredient. See the Foam Mixing and Expansion Table below for foam mixing and expansion ratios.

Foam Mixing and Expansion Table (all mixes produce 0.05% active ingredient foam)

Gallons of Foam Desired	Gallons of Water*	Amt. of PROTHOR SC 0.5 to Add to Water	Expansion Ratios
25	1.0	27.5 ounces	25:1
25	2.5	27.5 ounces	10:1
25	5.0	27.5 ounces	5:1
50	1.0	55.0 ounces	50:1
50	2.5	55.0 ounces	20:1
50	5.0	55.0 ounces	10:1

*Add the foaming agent manufacturer's recommended amount of foaming agent to solution after water and PROTHOR SC 0.5 are mixed. Verify that the foaming agent is compatible with PROTHOR SC 0.5 before mixing or using with PROTHOR SC 0.5.

Foam Application Use Directions

Using foam generating equipment, a solution of PROTHOR SC 0.5 (see Foam Mixing Instructions) may be converted into a predetermined amount foam according to the foaming agent and foaming equipment manufacturer's recommendations. Verify that the foaming agent is compatible with PROTHOR SC 0.5.

First, form a solution of PROTHOR SC 0.5 of the appropriate percentage concentration and volume (see Foam Mixing Instructions). Then add to the solution the recommended volume of foaming agent according to the foaming agent manufacturer's directions.

Foam applications may be made behind veneers, piers, chimney bases, into rubble foundations, into block voids, structural voids or other similar voids, under slabs, stoops, porches or to the soil in crawlspaces. Use dispersion tips and application methods appropriate to the site. Always apply a sufficient volume of PROTHOR SC 0.5 in the form of a foam alone or in combination with a liquid solution to provide a continuous treated zone at the recommended rate for specific application sites.

RETREATMENT

Retreatments for subterranean termites can only be performed if there is clear evidence of reinfestation or disruption of the barrier due to construction, excavation or landscaping and/or evidence of the breakdown of the termiticide barrier in the soil. These vulnerable or reinfested areas may be retreated in accordance with application techniques described in this product's labeling. The timing and type of these retreatments will vary, depending on factors such as termite pressure, soil types, soil conditions and other factors which may reduce the effectiveness of the barrier. Retreatment may be made as either a spot or complete treatment.

Retreatments in the absence of reinfestation or barrier disruption may be performed five or more years after a complete treatment was last applied to the structure. Such retreatments should be made based on the judgment of the applicator that such retreatment is necessary to ensure the continued protection of the structure from termite attack. In making such judgment, the applicator should take into account the expected useful life of the last treatment administered (based on efficacy testing) and conditions specific to the structure in question that may increase it vulnerebility to attack.

Annual retreatment of the structure is prohibited unless there is clear evidence that reinfestation or treated zone disruption has occurred.

APPLICATION IN CONJUNCTION WITH BORATES AND TERMITE BAITS

Spot only applications of PROTHOR SC 0.5 can be used as a supplement to borete treatments and termite baiting system installations that are labeled for stand alone protection against termite attack. Stand alone product is defined as a product that is labeled for the protection of a structure when applied alone without the use of other termite control products. Spot only applications are defined as the use of PROTHOR SC 0.5 according to any of the permitted and applicable post-treatment application techniques contained in this label, alone or in combination, to the extent needed or deemed necessary or useful as an adjunct to the application of e standalone product.

APPLICATION TO PROTECT UNDERGROUND ITEMS FROM SUBTERRANEAN TERMITE ATTACK

To protect components installed underground such as wires, conduits, cables and pipes buried in soil against termite attack, create an envelope of PROTHOR SC 0.5 treated soil around the components along the entire underground length of the component. First, treat soil through which components will be run with 0.05% to 0.10% solution of PROTHOR SC 0.5 at a rate of 2 gallons of solution per 10 linear feet. Install components, laying them on the treated soil. Cover components with untreated soil and then treat this covering soil using the same percent solution at 2 gallons of solution per 10 linear feet.

Underground components to be protected may be located within the foundation of a structure or outside of a structure such es within e utility right of way, for example. Do not treat items that are electrically energized at the time of application. If the soil will not absorb the indicated amount of solution, as little as 1 gallon of 0.10% solution per 10 linear feet can be used. Treat points where services emerge from the ground at a rate of 1 to 2 gallons of solution at the point of emergence.

APPLICATIONS TO PROTECT POLES, POSTS AND OTHER WOODEN ITEMS FROM SUBTERRANEAN TERMITE ATTACK

PROTHOR SC 0.5 can be used to protect the below ground portions of wooden structural components from termites. Form a treated zone around components below ground by vertically rodding the soil around their perimeter to a depth of six inches below their maximum depth of placement in the soil and applying a 0.05% to 0.10% solution of PROTHOR SC 0.5 at a rate of 0.4 gallons of solution per linear foot of perimeter around the component per foot of treated depth. Measure the perimeter of the component six inches from the outside of the component.

APPLICATIONS TO TERMITE CARTON NESTS LOCATED IN ABOVE GROUND WALL VOIDS

Apply a 0.05% to 0.10% solution of PROTHOR SC 0.5 directly into above ground termite carton nests including nests located in wall voids using a directional injector. Apply as a solution or foam under pressure to distribute solution thoroughly throughout the nest. It may be necessary to inject solution at one or more points and at varying depths within the nest to adequately distribute solution within the interior of the nest.

EXTERIOR APPLICATION FOR ANT CONTROL

Apply a 0.05% to 0.10% solution of PROTHOR SC 0.5 to the exterior of the structure as a general surface, spot, crack and crevice or wall void treatment. Apply at points where ants may enter the structure or crawl and hide including exterior surfaces, around doors end windows, under eaves, attic and foundation vents, utility entrances and cracks in the surface of the structure. Spray solution or foam into voids where ants or their nests are present. Apply a volume of solution sufficient to cover the target surface(s) however avoid excess dripping or runoff from vertical or overhead surfaces.

Treat soil, turf or ground cover (flower, shrub end plant beds) adjacent to the structure where ants are trailing or may find food. Ants tunneling in the soil may be controlled by applying a 0.05% to 0.10% solution of PROTHOR SC 0.5 as a drench or soil injection along the edge of foundations or other hard surfaces such as driveways. Apply in a volume sufficient to treat or cover the soil or foliage.

Inject a 0.05% to 0.10% solution of PROTHOR SC 0.5 in the form of a spray or foam into tree cavities or other parts of trees where ant nests are located.

Do not treat more often than once per month. Do not allow residents or pets into the immediate area during application or allow them to make contact with treated areas until spray has dried.

It is recommended to remove or pruna away shrubbery, bushes and tree branches touching the structure. Vegetation touching the structure may offer a route of entry for ants into the structure that allow ants to inhabit the structure without coming in contact with the treatment. If nests are found, direct treatment of nests with PROTHOR SC 0.5 can be made.

Do not use PROTHOR SC 0.5 against native fire ants, imported fire ants, pharaoh ants or harvester ants. Limit applications for control of carpenter ants to treatment of non-wooden parts or surfaces of structures.

ATTENTION

Do not apply to soil in areas where edible plants may be planted. Do not plant edible plants in soil that has been treated with PROTHOR SC 0.5.

IMPORTANT READ BEFORE USE

NOTICE: Read the entire Directions for Use, Conditions of Sale, Disclaimer of Warranties and Limitations of Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

CONDITIONS OF SALE: The Directions for Use of this product are believed to be adequate and must be followed carefully. However, because of manner of use and other factors beyond the control of Ensystex IV, Inc., it is impossible for Ensystex IV to eliminate all risks associated with the use of this product such as ineffectiveness or unintended consequences. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold Ensystex IV harmless for any claims relating to such factors.

DISCLAIMER OF WARRANTIES: To the extent consistent with applicable law, seller warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the Directions for Use when used in accordance with the Directions for Use under normal conditions of use. ENSYSTEX IV MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE, NOR ANY OTHER EXPRESS OR IMPLIED WARRANTIES WITH RESPECT TO THE SELECTION, PURCHASE, OR USE OF THIS PRODUCT THAT EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. Any warranties, express or implied, having been made are inappliceble if this product has been used contrary to label instructions, under abnormal conditions or under conditions not reasonably foreseeable by (or beyond the control of) seller or Ensystex IV, Inc., and buyer assumes the risk of any such use.

LIMITATIONS OF LIABILITY: To the extent consistent with applicable law, Ensystex IV shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF ENSYSTEX IV AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ENSYSTEX IV, THE REPLACEMENT OF THE PRODUCT.

This Conditions of Sale and Limitation of Warranty and Liability may not be amended by any oral or written agreement.

PROTHOR is a registered trademark of Ensystex IV, Inc.

Revised 3/07

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Michael Kellogg
Ensystex IV, Inc.
c/o Pyxis Regulatory Consulting, Inc.
4110 136'th Street N.W.
Gig Harbor, WA 98332

MAR 1[illegible]

Dear Mr. Kellogg:

Subject: Labeling Amendment; Corrected Labeling
Prothor SC 0.5
EPA Registration No. 83923-3
Submission Date: March 14, 2007

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable. A stamped copy is enclosed for your records. Please submit one (1) final printed copy for the above mentioned label before releasing the product for shipment. If you have any questions regarding this label, please contact me at (703) 306-0415.

Sincerely yours,

Kable Bo Davis
Entomologist
Insecticide-Rodenticide Branch
Registration Division (7505P)

Enclosure

PROTHOR SC 0.5

For use only by individuals/firms licensed or registered by the state to apply termiticide products. States may have more restrictive requirements regarding qualifications of persons using this product. Consult the structural pest control regulatory agency of your state prior to use of this product.

For prevention or control of subterranean termites in and around residential, commercial, industrial, institutional and public structures and buildings.

Active Ingredient:	**By Wt.**
Imidacloprid	5.65%
Other Ingredients:	94.35%
TOTAL:	100.0%

Contains 0.5 pounds of imidacloprid per gallon

Shake well before using

EPA Reg. No. 83923-3 EPA Est. XXXXX-XX-XXX

STOP – Read the label before use

KEEP OUT OF REACH OF CHILDREN

CAUTION

(PRECAUCION AL USUARIO: Si usted no puede leer o entender ingles, no use este producto hasta que la etiqueta le haya sido explicada ampliamente.)

(TO THE USER: If you cannot read and understand English, do not use this product until the label has been fully explained to you.)

For product use information call 1-866-FOR-THOR (367-8467) or visit www.for-thor.com.

NET CONTENTS: As marked on container

Manufactured by:

ENSYSTEX IV, Inc.

Fayetteville, NC 28303

FIRST AID	
If swallowed	• Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by a poison control center or doctor. • Do not give anything by mouth to an unconscious person.
If on skin or clothing	• Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15 to 20 minutes. • Call a poison control center or doctor for treatment advice.
If in eyes	• Hold eye open and rise slowly and gently with water for 15 to 20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.

HOTLINE NUMBER

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-866-367-8467 for emergency medical treatment information.

NOTE TO PHYSICIAN

No specific antidote is available. Treat the patient symptomatically.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION

Harmful if swallowed, inhaled or absorbed through skin. Causes eye irritation. Avoid contact with skin, eyes or clothing. Avoid breathing dust or vapor. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing and wash before reuse. Keep children and pets away from treated area until dry.

Personal Protective Equipment: All pesticide handlers (mixers, loaders and applicators) must wear long-sleeved shirt and long pants, socks, shoes and chemical-resistant gloves made of waterproof material such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, polyethylene, polyvinyl chloride or viton. After the product is diluted in accordance with label directions for use, shirt, pants, socks and chemical-resistant gloves are sufficient protection. All pesticide handlers must wear protective eyewear, such as goggles, faceshield or safety glasses, when working in a non-ventilated space or when applying as a termiticide by rodding or sub-slab injection.

Termite Control Treatment: When treating adjacent to an existing structure, the applicator must check the area to be treated and immediately adjacent areas of the structure for visible and accessible cracks and holes to prevent any leaks or significant exposures to persons occupying the structure. People present or residing in the structure during application must be advised to remove their pets and themselves from the structure if they see any signs of leakage. After application, the applicator is required to check for leaks. All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site. Do not allow people or pets to contact contaminated areas or to reoccupy contaminated areas of the structure until the cleanup is completed.

Environmental Hazards

This pesticide is highly toxic to aquatic invertebrates. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters. Apply this product only as specified on this label. Extreme care must be taken to avoid runoff. Apply only to soil or other fill substrate that will accept the solution at the specified rate. Do not treat soil that is water-saturated or frozen or in any conditions where run-off or movement from the treated area (site) is likely to occur.

Physical and Chemical Hazards

Do not apply this product or solutions of this product around electrical equipment, such as electrical conduits, motor housings, junction boxes, switch boxes, etc. due to the possibility of shock hazard.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Keep out of reach of children and animals. Store in original containers only. Store in a cool, dry place and avoid excess heat. Handle and open container in a manner so as to prevent spillage. Do not put concentrate or dilute material into food or drink containers. Preferably store in a locked area.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site (in the treatment area) or at an approved waste disposal facility.

Container Disposal: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or by incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

In Case of Spill: Confine it, avoid contact, isolate area and keep animals and unprotected persons away. If spill is liquid, form dike around spill aree and/or absorb spill with absorbent materials, such as sand, cat litter or clay. If spill is dry powder only, sweep material into a suitable container. Place damaged package in a holding container and identify contents. Contact Ensystex IV at 1-866-367-8467 or Chemtrec at 1-800-424-9300 for any assistance.

APPLICATION FOR CONTROL OF SUBTERRANEAN TERMITES

General

PROTHOR SC 0.5, in the form of a dilute insecticidal solution, prevents and controls subterranean termite infestations in and around structures and other items by creating a continuous chemically treated zone (horizontal and/or vertical as needed) between the wood and other cellulose material in a structure and termite colonies in the soil. In order to establish a zone between the wood in the structure and the termites in the soil, adequately disperse the solution of this product in the soil.

To effectively control subterranean termites with this product, the service technician should be familiar with current subterranean termite control practices including trenching, rodding, sub-slab and void injection, soil surface fan spraying and excavated soil treatment. Correct use of these techniques is necessary to effectively control infestations by subterranean termites such as *Coptotermes, Heterotermes and Reticulitermes*. The service technician should consider the biology and behavior of the termite specie(s) to be controlled to determine which control practices to use.

Treatment standards and procedures for subterranean termite control may vary due to regulations, water table level, structure design, soil types, construction practices and other factors. For advice concerning current control practices with respect to specific local conditions, consult resources in structural pest control and state cooperative extension and regulatory agencies. Follow all federal, state and local regulations and treatment standards for protection of a structure from subterranean termites.

Effective termite control may also include mechanical alteration of the structure. Elimination of leaks or points of moisture accumulation within or on the exterior of the structure that result in an increase in the moisture content of wooden structural components is advised. Removal of non-essential cellulose containing materials that are in contact with the ground under or around the structure can reduce termite foraging in the area.

PROTHOR SC 0.5 is labeled for use against subterranean termites as a 0.05% to 0.10% solution in water. Generally, the 0.05% rate is used for typical control situations. When severe or persistent infestations are occurring, a 0.10% solution may be more appropriate. When difficult or problem soils or construction types are encountered, it may be necessary to use 0.10% PROTHOR SC 0.5 mixed in reduced volumes of water.

Avoid contamination of water supplies due to backflow under reduced water system pressure by using anti-backflow equipment or procedures to prevent siphoning of any solution back into a water supply. Do not contaminate cisterns or wells. Do not treat soil that is water saturated or frozen. Do not treat while precipitation is occurring. Do not apply solution to an area or site if the soil at the area or site is in such a state or condition that runoff or movement of the solution from the treated area or site is likely to occur. Structures that contain wells or cisterns within the foundation of the structure can only be treated using the treated backfill method described in the treatment around wells and cisterns section of this label. Consult state and local specifications for recommended distances of wells from treated areas, or if such regulations do not exist, refer to Federal Housing Administration Specifications (H.U.D.) for guidance.

Dilution and Mixing of PROTHOR SC 0.5

Use rates for PROTHOR SC 0.5 are expressed and the solution is mixed according to the percentage (%) concentration it forms when mixed in water. Use the *Mixing Table for PROTHOR SC 0.5* or alternately the formulas below to determine the amount of PROTHOR SC 0.5 to add to any quantity of water.

To mix, measure out the required amount of PROTHOR SC 0.5 according to the *Mixing Table for PROTHOR SC 0.5*. Pour this amount of PROTHOR SC 0.5 into the spray tank as it is being filled with water with the agitator operating.

Mix PROTHOR SC 0.5 to create a use dilution in the following manner:

1. Fill tank 1/4 to 1/3 full.
2. Start pump to begin by-pass agitation and place end of treating tool in tank to allow circulation through hose.
3. Add appropriate amount of PROTHOR SC 0.5.
4. Add remaining amount of water.
5. Let pump run and allow recirculation through the hose for 2 to 3 minutes."

Prothor SC may also be mixed into full tanks of water, but substantial agitation is required to ensure uniformity of the solution.

Mixing Table for PROTHOR SC 0.5

Solution Percentage Concentration Desired	Gallons of Finished Solution Desired	Fluid Ounces of PROTHOR SC 0.5 to add
0.05%	25	27.5
	50	55.0
	100	110.0
0.10%	25	55.0
	50	110.0
	100	220.0

Calculating an Amount of PROTHOR SC 0.5 to Mix

To mix any amount of PROTHOR SC 0.5 determine:

A = Gallons of water into which PROTHOR SC 0.5 will be mixed. Express any partial gallons as decimal fractions (1/2 = .5).

Fluid ounces of PROTHOR SC 0.5 to add to A gallons for 0.05% = A x 1.1

Fluid ounces of PROTHOR SC 0.5 to add to A gallons for 0.10% = A x 2.2

Proportional Injector Mixing Table For PROTHOR SC 0.5

Solution Percentage Concentration Desired	Injector Volume (fluid ounces per gallon)
0.05%	1.10
0.10%	2.20

Application Volume

To provide maximum control and protection against termite infestation, apply the specified volume of the finished water solution containing the specified amount of PROTHOR SC 0.5 as set out below or as otherwise directed in this label.

Prescribed Horizontal Barrier Rate: Unless otherwise directed, horizontal barriers are created by applying a 0.05% to 0.10% solution at a rate of one gallon of solution per 10 square feet.

Prescribed Vertical Barrier Rate: Unless otherwise directed, vertical barriers are created by applying a 0.05% to 0.10% solution at a rate of four gallons of solution per 10 linear feet per foot of depth.

Adjustments to Application Volume

If soil will not accept the labeled application volumes, the volume may be reduced provided there is a corresponding increase in concentration so that the amount of active ingredient applied to the soil remains the same.

Note: Large reductions of application volume reduce the likelihood of obtaining a continuous barrier. Variance is allowed when volume and concentration are consistent with label directed rates and a continuous barrier can still be achieved. When volume is reduced, the spacing of holes created for sub slab injection and soil rodding may need to be reduced to account for decreased dispersion of the solution in the soil.

For example, adjust the amount of solution applied to deliver a horizontal barrier of 10 square feet from 1 gallon to as low as 0.5 gallons and as high as 2 gallons while maintaining the amount of PROTHOR SC 0.5 applied per 10 square feet.

For example, adjust the amount of solution applied to deliver a vertical barrier 10 feet long by one foot deep from 4 gallons to as low as 2 gallons and as high as 8 gallons while maintaining the amount of PROTHOR SC 0.5 applied per 10 linear feet.

PRE-CONSTRUCTION TREATMENT

All Structures

Do not apply at a lower dosage and/or concentration than specified on this label for applications prior to the installation of the finished grade.

Prior to each application, applicators must notify the general contractor, construction superintendent, or similar responsible party, of the intended termiticide application and intended sites of application and instruct the responsible person to notify construction workers and other individuals to leave the area to be treated during application and until the termiticide is absorbed into the soil.

Concrete Slab On Ground or Basements

Apply an overall treatment to the entire surface of soil or other substrate to be covered by the slab including areas to be under carports, porches, basement floors and entrance platforms. Apply solution uniformly at the Prescribed Horizontal Barrier Rate. If fill under slab is gravel or other coarse aggregate, apply at the rate of 1.5 gallons per 10 square feet or sufficient volume of solution to uniformly cover each 10 square feet. To provide a uniform treated zone in soil at critical areas such as along the inside of foundation walls, and around plumbing, bath traps, utility services, and other features that will penetrate the slab, apply solution at the Prescribed Vertical Barrier Rate to these areas.

After completion of grading, make an application by trenching or trenching and rodding around the slab or foundation perimeter and applying solution at the Prescribed Vertical Barrier Rate. Rodding may be done from the bottom of a shallow trench. When rodding, rod holes must be spaced in a manner that will allow for a continuous chemical treated zone to be deposited along the treated area (place holes 12 or fewer inches apart). Rod holes should not extend below the footing. When trenching, the trench along the outside foundation should be about 6 inches in width and 6 inches in depth. Use a low pressure spray (not to exceed 25 PSI at the treatment tool when the valve is open) to treat the soil which will be placed into the trench after rodding. Mix the spray solution with soil as it is being placed in the trench. When treating voids in hollow masonry units, apply 2 gallons of solution per 10 linear feet of wall. Apply solution so it will reach the footing by injecting into the lower areas of the wall, just above the floor or footing.

When treating foundations deeper than 4 feet, apply the termiticide as the backfill is being replaced, or if the construction contractor fails to notify the applicator to permit this, treat the foundation to a minimum depth of 4 feet after the backfill has been installed. The applicator must trench and rod into the trench or trench along the foundation walls and around pillars and other foundation elements and treat the soil at the Prescribed Vertical Barrier Rate from grade to a minimum depth of 4 feet. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. However, in no case should a structure be treated below the footing. Rodding in trench followed by flooding of trench and treatment of backfill may provide a better chance of achieving a continuous treated zone than using soil rodding alone to establish a vertical treated zone.

Crawl Spaces

Application must be made by trenching or trenching and rodding downward along the inside and outside of foundation walls, around piers, interior supports in contact with the soil, plumbing, and utility services at the Prescribed Vertical Barrier Rate. Rodding may be done from the bottom of a shallow trench to the top of the footing or a minimum of 4 feet. When rodding, rod holes must be spaced in a manner that will allow for a continuous treated zone to be deposited along the treated area. Rod holes should not extend below the footing. When trenching, the trench should be about 6 inches wide and 6 inches deep. Use a low pressure spray to treat soil which will be placed in the trench, mixing the spray solution with soil as it is being placed in the trench.

Hollow Block Foundations and Voids

Hollow block foundations or voids in masonry resting on the footing may be treated to create a continuously treated zone in the voids at the footing. Apply 2 gallons of solution per 10 linear feet to the lower part of the void so that it reaches the top of the footing or soil. Treatment of voids in block or rubble foundation walls must be closely examined. Applicators must inspect areas of possible runoff as a precaution against application leakage in the treated areas. Some areas may not be treatable or may require mechanical alteration prior to treatment. All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site (refer to Precautionary Statements). Do not allow people or pets to contact or to reoccupy the contaminated areas of the structure until the clean up is completed.

POST CONSTRUCTION TREATMENT

All Structures

Do not apply treatment until the identity and location of all wells, radiant heat pipes, water and sewer lines, electrical conduits and sub-slab heating and air conditioning ducts is established. Caution must be taken to avoid puncturing these elements and/or injecting solution into them. All holes in commonly occupied areas into which material has been applied must be plugged. Plugs must be of a non-cellulose material or covered by an impervious, non-cellulose material.

Vertical Barrier Depth: For applications made after the final grade is installed, the applicator must trench and rod into the trench or trench along the foundation walls and around pillars and other foundation elements and treat at the rate prescribed from grade to the top of the footing. When the footing is more than four (4) feet below grade, the applicator must trench and rod into the trench or trench along the foundation walls and treat at the rate prescribed to a minimum depth of four feet. The actual depth of treatment will very depending on the soil type, degree of compaction, and location of termite activity. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. However, in no case should a structure be treated below the footing.

Structures Containing Concrete Slabs on Ground (Monolithic/Floating/Supported) including Basements

To make an application beneath existing slabs, it may be necessary to drill holes in the slab or adjacent foundation and to apply solution. Holes should be spaced such that when treatment is applied through them, a continuous treated zone is applied beneath the slab.

Treat all existing cracks and cold, construction or expansion joints. Also, treat around bath traps, plumbing and utility services which penetrate the slab. Apply 4 gallons per 10 lineal feet per foot of depth to provide a uniform treated zone.

Vertical Barriers Along Exterior of Foundation Walls: Trench and rod into the trench or trench along the outside of foundation walls and treat at the Prescribed Vertical Barrier Rate to the depth specified under Vertical Barrier Depth. Where physical obstructions such as concrete walkways adjacent to foundation elements or soil type and/or conditions make trenching prohibitive, treatment may be made by rodding alone.

Vertical Barriers Along Interior of Foundation Walls: Vertical barriers may be established on the interior side of foundation walls by sub-slab injection of the solution at the Prescribed Vertical Barrier Rate. Injection openings can be drilled either vertically through the slab along the interior of the foundation wall or horizontally from the exterior through the foundation wall low enough on the wall to allow for the deposition of the solution beneath the slab along the interior side of the foundation wall. Drill holes should be spaced so as to achieve a continuous chemical barrier but in no case farther apart than 12 inches. Special care must be taken to distribute the solution evenly. Vertical barriers may also be established beneath the slab along both sides of interior footing-supported walls, one side of interior partitions and along all crecks and expansion joints and utility service entrances and bath traps.

Horizontal Barriers Beneath Slabs on Ground: Create a horizontal barrier by treating at the Prescribed Horizontal Barrier Rate beneath slabs by either drilling and long rodding from the exterior or by grid pattern drilling and injection vertically through the slab. Long rodding should be used only when grid pattern drilling and injection and horizontal short rodding and injection cannot be used to deliver the sub slab treatment.

Bath Traps: Exposed soil beneath and around areas where plumbing and utility services penetrate the slab should be treated at the rate of 3 gallons of solution per square foot of soil.

Structures Containing Accessible Crawl Spaces

For crawl spaces, including sealed underfloor spaces that serve as heating and air conditioning plenums, apply vertical termiticide barriers at the rate of 4 gallons of solution per 10 linear feet per foot of depth from grade to the top of the footing, or if the footing is more than 4 feet below grade, to a minimum depth of 4 feet. Apply by trenching and rodding into the trench, or trenching. Treat both sides of foundation and around all piers and pipes. Where physical obstructions such as concrete walkways adjacent to foundation elements prevent trenching, treatment may be made by rodding alone. When soil type and/or conditions make trenching prohibitive, rodding may be used. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. Read and follow the mixing and use direction section of the label if situations are encountered where the soil will not accept the full application volume.

1. Rod holes and trenches must not extend below the bottom of the footing.

2. Rod holes must be spaced so as to achieve a continuous termiticide barrier but in no case more than 12 inches apart.

3. Trenches must be a minimum of 6 inches deep or to the bottom of the footing, whichever is less, and need not be wider than 6 inches. When trenching in sloping (tiered) soil, the trench must be stepped to ensure adequate distribution and to prevent termiticide from running off. The solution must be mixed with the soil as it is replaced in the trench.

4. When treating crawl spaces used as plenums, turn off the air circulation system of the structure until application has been completed and all solution has been absorbed by the soil.

Subterranean termites can be prevented from constructing shelter tubes directly between the crawl space soil surface and overhead crawl space wooden members by the application of an overall treatment of the crawl space soil surface at the Prescribed Horizontal Barrier Rate using a 0.05% to 0.10% solution of PROTHOR SC 0.5.

PROTHOR SC 0.5 can be applied as a general fan spray within crawl spaces directly to swarming and exposed worker termites at the Prescribed Horizontel Barrier Rate using a 0.05% to 0.10% solution of PROTHOR SC 0.5.

Note: Overall treatments (treatments where chemical is applied more than 18 inches from the foundation walls, piers and pipes) should not be applied within a crawl space that serves as a plenum.

Structures Containing Inaccessible Crawl Spaces

For inaccessible interior areas, such as areas where there is insufficient clearance between floor joists and ground surfaces to allow operator access, excavate, if possible, and treat according to the instructions for accessible crawl spaces. Otherwise, apply one, or a combination of the following two methods.

1. To establish a horizontel barrier, apply to the soil surface, 1 gallon of solution per 10 square feet overall using a nozzle pressure of less than 25 p.s.i. and a coarse application nozzle (e.g., Delavan Type RD Raindrop, RD-7 or larger, or Spraying Systems Co. 8010LP TeeJet or comparable nozzle). For an area that cannot be reached with the application wand, use one or more extension rods to make the application to the soil. Do not broadcast or power spray with higher pressures.

2. To establish a horizontal barrier, drill through the foundation wall or through the floor above and treat the soil perimeter at a rate of 1 gallon of solution per 10 square feet. Drill spacing must be at intervals not to exceed 16 inches. Many states have smaller intervals, so check state regulations which may apply.

When treating crawl spaces used as plenums, turn off the air circulation system of the structure until application has been completed and all termiticide has been absorbed by the soil.

Note: Overall treatments (treatments where chemical is applied more than 18 inches from the foundation walls, piers and pipes) should not be applied within a crawl space that serves as a plenum.

Masonry Voids

Drill and treat voids in multiple masonry elements of the structure extending from the structure to the soil in order to create a continuous treatment barrier in the area to be treated. Apply at the rate of 2 gallons of solution per 10 linear feet of footing using a nozzle pressure of less than 25 p.s.i. When using this treatment access holes must be drilled below the sill plate and should be as close as possible to the footing as is practical. Treatment of voids in block or rubble foundation walls must be closely examined: Applicators must inspect areas of possible runoff as a precaution against application leakage in the treated areas. Some areas may not be treatable or may require mechanical alteration prior to treatment.

All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site. Do not allow people or pets to contact contaminated areas or to reoccupy the contaminated areas of the structure until the clean-up is completed.

Note: When drilling veneer walls, care should be taken to not drill beyond the depth of the void behind the veneer into another construction layer behind the veneer. It is however permissible to drill through the veneer and into concrete blocks behind the veneer and to treat the veneer and the concrete blocks at the same time.

Note: Not for use in voids insulated with rigid foam.

TREATMENT OF STRUCTURES WITH WELLS AND CISTERNS

Do not contaminate wells or cisterns.

Structures with Wells/Cisterns Inside Foundations

Structures that contain wells or cisterns within the foundation of a structure can only be treated using the following techniques:

Do not treat soil while it is beneath or within the foundation or along the exterior perimeter of a structure that contains a well or cistern. The treated backfill method must be used if soil is removed and treated outside/away from the foundation. The treated backfill technique is described as follows:

a. Trench and remove soil to be treated onto heavy plastic sheeting or similar material or into a wheelbarrow.

b. Treat the soil at the rate of 4 gallons of dilute solution per 10 linear feet per foot of depth of the trench, or 1 gallon per 1.0 cubic feet of soil. See *Mixing Directions for PROTHOR SC 0.5 for Use as a Termiticide* section of the label. Mix thoroughly into the soil taking care to contain the liquid and prevent runoff or spillage.

c. After the treated soil has absorbed the solution, replace the soil into the trench.

Structures with Adjacent Wells/Cisterns and/or Other Water Bodies

Applicators must inspect all structures with nearby water sources such as wells, cisterns, surface ponds, streams, and other bodies of water and evaluate, at a minimum, the treatment recommendations listed below prior to making an application.

1. Prior to treatment, if feasible, expose the water pipe(s) coming from a well to the structure, if the pipe(s) enter the structure within 3 feet of grade.

2. Prior to treatment, applicators are advised to take precautions to limit the risk of applying the termiticide into subsurfece drains that could empty into any bodies of water. These precautions include evaluating whether application of the termiticide to the top of the footer may result in contamination of the subsurface drain. Factors such as depth to the drain system and soil type and degree of compaction should be taken into account in determining the depth of treatment.

3. When appropriate (for example, on the water side of the structure), the treated backfill technique (described above) can also be used to minimize offsite movement of termiticide.

FOAM APPLICATION

PROTHOR SC 0.5, in the form of a foam, can be used to deliver PROTHOR SC 0.5 as a termiticide any time it appears likely this form of delivery will improve the dispersal of PROTHOR SC 0.5 into and within the intended target area. Construction practices, soil subsidence and other factors may create situations in which a continuous treated zone cannot be achieved using conventional treatment alone. In these situations or wherever else it becomes necessary, conventional application methods can be supplemented through the use of foam (created by the use of foam generating equipment, or similar devices) to create a continuous treated zone. Foam can be particularly useful to deliver PROTHOR SC 0.5 where it either cannot be depended upon to be delivered as just a solution or due to a need to reduce the amount of water used in order to avoid water damage to the target or adjacent areas.

Depending on the circumstances, foam applications of PROTHOR SC 0.5 may be used alone or in combination with liquid solution applications, provided that the cumulative amount of active ingredient applied per unit of area is equivalent to that which would be applied according to a solution-only application at the recommended rate. At least 75% of the gallons of PROTHOR SC 0.5 must be applied as a typical liquid treatment. The remaining 25% or less gallons can be delivered to appropriate locations using e foam application. The application of the correct volume and amount of active ingredient are essential to the application of an effective treatment.

Foam Mixing Instructions

27.5 ounces of PROTHOR SC 0.5 can be mixed with between 1 and 5 gallons of water and expanded to create 25 gallons of foam containing 0.05% active ingredient. 55.0 ounces of PROTHOR SC 0.5 can be mixed with between 1 and 5 gallons of water and expanded to create 50 gallons of foam containing 0.05% active ingredient. See the Foam Mixing and Expansion Table below for foam mixing and expansion ratios.

Foam Mixing and Expansion Table (all mixes produce 0.05% active ingredient foam)

Gallons of Foam Desired	Gallons of Water*	Amt. of PROTHOR SC 0.5 to Add to Water	Expansion Ratios
25	1.0	27.5 ounces	25:1
25	2.5	27.5 ounces	10:1
25	5.0	27.5 ounces	5:1
50	1.0	55.0 ounces	50:1
50	2.5	55.0 ounces	20:1
50	5.0	55.0 ounces	10:1

*Add the foaming agent manufacturer's recommended amount of foaming agent to solution after water and PROTHOR SC 0.5 are mixed. Verify that the foaming agent is compatible with PROTHOR SC 0.5 before mixing or using with PROTHOR SC 0.5.

Foam Application Use Directions

Using foam generating equipment, a solution of PROTHOR SC 0.5 (see Foam Mixing Instructions) may be converted into a predetermined amount foam according to the foaming agent and foaming equipment manufacturer's recommendations. Verify that the foaming agent is compatible with PROTHOR SC 0.5.

First, form a solution of PROTHOR SC 0.5 of the appropriate percentage concentration and volume (see Foam Mixing Instructions). Then add to the solution the recommended volume of foaming agent according to the foaming agent manufacturer's directions.

Foam applications may be made behind veneers, piers, chimney bases, into rubble foundations, into block voids, structural voids or other similar voids, under slabs, stoops, porches or to the soil in crawlspaces. Use dispersion tips and application methods appropriate to the site. Always apply e sufficient volume of PROTHOR SC 0.5 in the form of a foam alone or in combination with a liquid solution to provide a continuous treated zone at the recommended rate for specific application sites.

RETREATMENT

Retreatments for subterranean termites can only be performed if there is clear evidence of reinfestation or disruption of the barrier due to construction, excavation or landscaping and/or evidence of the breakdown of the termiticide barrier in the soil. These vulnerable or reinfested areas may be retreated in accordance with application techniques described in this product's labeling. The timing and type of these retreatments will vary, depending on factors such as termite pressure, soil types, soil conditions and other factors which may reduce the effectiveness of the barrier. Retreatment may be made as either a spot or complete treatment.

Retreatments in the absence of reinfestation or barrier disruption may be performed five or more years after a complete treatment was last applied to the structure. Such retreatments should be made based on the judgment of the applicator that such retreatment is necessary to ensure the continued protection of the structure from termite attack. In making such judgment, the applicator should take into account the expected useful life of the last treatment administered (based on efficacy testing) and conditions specific to the structure in question that may increase it vulnerability to attack.

Annual retreatment of the structure is prohibited unless there is clear evidence that reinfestation or treated zone disruption has occurred.

APPLICATION IN CONJUNCTION WITH BORATES AND TERMITE BAITS

Spot only applications of PROTHOR SC 0.5 can be used as a supplement to borate treatments and termite baiting system installations that are labeled for stand alone protection against termite attack. Stand alone product is defined as a product that is labeled for the protection of a structure when applied alone without the use of other termite control products. Spot only applications are defined as the use of PROTHOR SC 0.5 according to any of the permitted and applicable post-treatment application techniques contained in this label, alone or in combination, to the extent needed or deemed necessary or useful as an adjunct to the application of a standalone product.

APPLICATION TO PROTECT UNDERGROUND ITEMS FROM SUBTERRANEAN TERMITE ATTACK

To protect components installed underground such as wires, conduits, cables and pipes buried in soil against termite attack, create an envelope of PROTHOR SC 0.5 treated soil around the components along the entire underground length of the component. First, treat soil through which components will be run with 0.05% to 0.10% solution of PROTHOR SC 0.5 at a rate of 2 gallons of solution per 10 linear feet. Install components, laying them on the treated soil. Cover components with untreated soil and then treat this covering soil using the same percent solution at 2 gallons of solution per 10 linear feet.

Underground components to be protected may be located within the foundation of a structure or outside of a structure such as within a utility right of way, for example. Do not treat items that are electrically energized at the time of application. If the soil will not absorb the indicated amount of solution, as little as 1 gallon of 0.10% solution per 10 linear feet can be used. Treat points where services emerge from the ground at a rate of 1 to 2 gallons of solution at the point of emergence.

APPLICATIONS TO PROTECT POLES, POSTS AND OTHER WOODEN ITEMS FROM SUBTERRANEAN TERMITE ATTACK

PROTHOR SC 0.5 can be used to protect the below ground portions of wooden structural components from termites. Form a treated zone around components below ground by vertically rodding the soil around their perimeter to a depth of six inches below their maximum depth of placement in the soil and applying a 0.05% to 0.10% solution of PROTHOR SC 0.5 at a rate of 0.4 gallons of solution per linear foot of perimeter around the component per foot of treated depth. Measure the perimeter of the component six inches from the outside of the component.

APPLICATIONS TO TERMITE CARTON NESTS LOCATED IN ABOVE GROUND WALL VOIDS

Apply a 0.05% to 0.10% solution of PROTHOR SC 0.5 directly into above ground termite carton nests including nests located in wall voids using a directional injector. Apply as a solution or foam under pressure to distribute solution thoroughly throughout the nest. It may be necessary to inject solution at one or more points and at varying depths within the nest to adequately distribute solution within the interior of the nest.

EXTERIOR APPLICATION FOR ANT CONTROL

Apply a 0.05% to 0.10% solution of PROTHOR SC 0.5 to the exterior of the structure as a general surface, spot, crack and crevice or wall void treatment. Apply at points where ants may enter the structure or crawl and hide including exterior surfaces, around doors and windows, under eaves, attic and foundation vents, utility entrances and cracks in the surface of the structure. Spray solution or foam into voids where ants or their nests are present. Apply a volume of solution sufficient to cover the target surface(s) however avoid excess dripping or runoff from vertical or overhead surfaces.

Treat soil, turf or ground cover (flower, shrub and plant beds) adjacent to the structure where ants are trailing or may find food. Ants tunneling in the soil may be controlled by applying a 0.05% to 0.10% solution of PROTHOR SC 0.5 as a drench or soil injection along the edge of foundations or other hard surfaces such as driveways. Apply in a volume sufficient to treat or cover the soil or foliage.

Inject a 0.05% to 0.10% solution of PROTHOR SC 0.5 in the form of a spray or foam into tree cavities or other parts of trees where ant nests are located.

Do not treat more often than once per month. Do not allow residents or pets into the immediate area during application or allow them to make contact with treated areas until spray has dried.

It is recommended to remove or prune away shrubbery, bushes and tree branches touching the structure. Vegetation touching the structure may offer a route of entry for ants into the structure that allow ants to inhabit the structure without coming in contact with the treatment. If nests are found, direct treatment of nests with PROTHOR SC 0.5 can be made.

Do not use PROTHOR SC 0.5 against native fire ants, imported fire ants, pharaoh ants or harvester ants. Limit applications for control of carpenter ants to treatment of non-wooden parts or surfaces of structures.

ATTENTION

Do not apply to soil in areas where edible plants may be planted. Do not plant edible plants in soil that has been treated with PROTHOR SC 0.5.

IMPORTANT READ BEFORE USE

NOTICE: Read the entire Directions for Use, Conditions of Sale, Disclaimer of Warranties and Limitations of Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

CONDITIONS OF SALE: The Directions for Use of this product are believed to be adequate and must be followed carefully. However, because of manner of use and other factors beyond the control of Ensystex IV, Inc., it is impossible for Ensystex IV to eliminate all risks associated with the use of this product such as ineffectiveness or unintended consequences. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold Ensystex IV harmless for any claims relating to such factors.

DISCLAIMER OF WARRANTIES: To the extent consistent with applicable law, seller warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the Directions for Use when used in accordance with the Directions for Use under normal conditions of use. ENSYSTEX IV MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE, NOR ANY OTHER EXPRESS OR IMPLIED WARRANTIES WITH RESPECT TO THE SELECTION, PURCHASE, OR USE OF THIS PRODUCT THAT EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. Any warranties, express or implied, having been made are inapplicable if this product has been used contrary to label instructions, under abnormal conditions or under conditions not reasonably foreseeable by (or beyond the control of) seller or Ensystex IV, Inc., and buyer assumes the risk of any such use.

LIMITATIONS OF LIABILITY: To the extent consistent with applicable law, Ensystex IV shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF ENSYSTEX IV AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ENSYSTEX IV, THE REPLACEMENT OF THE PRODUCT.

This Conditions of Sale and Limitation of Warranty and Liability may not be amended by any oral or written agreement.

PROTHOR is a registered trademark of Ensystex IV, Inc.

Revised 3/07

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs
Registration Division (H7505C)
401 "M" St., S.W.
Washington, D.C. 20460

EPA Reg. Number:	Date of Issuance:
83923-3	

Term of Issuance: Conditional

Name of Pesticide Product:
Prothor SC 0.5

NOTICE OF PESTICIDE:
x Registration
__ Reregistration

(under FIFRA, as amended)

Name and Address of Registrant (include ZIP Code):

Mr. Michael Kellogg
Ensystex IV, Inc.
c/o Pyxis Regulatory Consulting, Inc.
4110 136th Street, NW
Gig Habor, WA 98332

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act.

egistration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA sec. 3(c)(7)(A). Once a pesticide is registered, however, it is not regarded as permanently acceptable. Registration does not eliminate the need for continual reassessment of pesticides. If the Agency determines that, at any time, additional data are required to maintain in effect an existing registration, the Agency will require submission of such data under FIFRA section (3)(c)(2)(B).

1. Revise the EPA Registration Number to read, EPA Reg. No. "83923-3".

Signature of Approving Official:

Dani Daniel
Insecticide-Rodenticide Branch
Registration Division (7505P)

Date:

MAR 6 2007

EPA Form 8570-6

2. Under the Personal Protective Equipment you must use the Agency's gloves statement which read: **"Chemical resistant gloves made of waterproof material such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, polyethylene, polyvinyl chloride or viton."**

3. Make the following changes to the "Conditions of Sale and Warranty" statement:

- Under the heading entitled "**Conditions of Sales**" change the word "**should**" to "**must**". The sentence would then read "**must be followed carefully**".

- Under the heading beginning "**Limitations of Liability**" At the beginning of the sentence, add the statement "**To the extent consistent with applicable law**"...

4. Submit two copies of your final printed labeling before you release the product for shipment. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sect. 6(e). Your release for shipment of the product constitute acceptance of these conditions.

5. Submit to the Agency the required one year storage stability (830.6317) and corrosion characteristics (830.6320) studies for the proposed product under warehouse conditions. The studies may be carried out concurrently. It is recommended that observations be made at 0, 3, 6, 9, and 12 months.

A stamped copy of the label is enclosed for your records. If you have any questions regarding this notice, please contact me at (703) 305-5409.

Enclosure:

ACCEPTED
with COMMENTS
In EPA Letter Dated:
MAR 6 2007
Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No. 83923-X

PROTHOR SC 0.5

r use only by individuals/firms licensed or registered by the state to apply termiticide products. States may have more restrictive requirements regarding qualifications of persons using this product. Consult the structural pest control regulatory agency of your state prior to use of this product.

For prevention or control of subterranean termites in and around residential, commercial, industrial, institutional and public structures and buildings.

Active Ingredient:	By Wt.
Imidacloprid	5.65%
Other Ingredients:	94.35%
TOTAL:	100.0%

Contains 0.5 pounds of imidacloprid per gallon

Shake well before using

EPA Reg. No. 83923-X EPA Est. No.

STOP – Read the label before use

KEEP OUT OF REACH OF CHILDREN

CAUTION

(PRECAUCION AL USUARIO: Si usted no puede leer o entender ingles, no use este producto hasta que la etiqueta le haya sido explicada ampliamente.)

(TO THE USER: If you cannot read and understand English, do not use this product until the label has been fully explained to you.)

For product use information call 1-866-FOR-THOR (367-8467) or visit www.for-thor.com.

NET CONTENTS: As marked on container

Manufactured by:

ENSYSTEX IV, Inc.

Fayetteville, NC 28303

FIRST AID	
If swallowed	• Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by a poison control center or doctor. • Do not give anything by mouth to an unconscious person.
If on skin or clothing	• Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15 to 20 minutes. • Call a poison control center or doctor for treatment advice.
If in eyes	• Hold eye open and rise slowly and gently with water for 15 to 20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.

HOTLINE NUMBER

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-866-367-8467 for emergency medical treatment information.

NOTE TO PHYSICIAN

No specific antidote is available. Treat the patient symptomatically.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION

Harmful if swallowed, inhaled or absorbed through skin. Causes eye irritation. Avoid contact with skin, eyes or clothing. Avoid breathing dust or vapor. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing and wash before reuse. Keep children and pets away from treated area until dry.

Personal Protective Equipment: All pesticide handlers (mixers, loaders and applicators) must wear long-sleeved shirt and long pants, socks, shoes and water-proof gloves. After the product is diluted in accordance with label directions for use, shirt, pants, socks and water-proof gloves are sufficient protection. All pesticide handlers must wear protective eyewear, such as goggles, faceshield or safety glasses, when working in a non-ventilated space or when applying as a termiticide by rodding or sub-slab injection.

Termite Control Treatment: When treating adjacent to an existing structure, the a pplicator must check the area to be treated and immediately adjacent areas of the structure for visible and accessible cracks and holes to prevent any leaks or significant exposures to persons occupying the structure. People present or residing in the structure during application must be advised to remove their pets and themselves from the structure if they see any signs of leakage. After application, the applicator is required to check for leaks. All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site. Do not allow people or pets to contact contaminated areas or to reoccupy contaminated areas of the structure until the cleanup is completed.

Environmental Hazards

This pesticide is highly toxic to aquatic invertebrates. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters. Apply this product only as specified on this label. Extreme care must be taken to avoid runoff. Apply only to soil or other fill substrate that will accept the solution at the specified rate. Do not treat soil that is water-saturated or frozen or in any conditions where run-off or movement from the treated area (site) is likely to occur.

Physical and Chemical Hazards

Do not apply this product or solutions of this product around electrical equipment, such as electrical conduits, motor housings, junction boxes, switch boxes, etc. due to the possibility of shock hazard.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Keep out of reach of children and animals. Store in original containers only. Store in a cool, dry place and avoid excess heat. Handle and open container in a manner so as to prevent spillage. Do not put concentrate or dilute material into food or drink containers. Preferably store in a locked area.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site (in the treatment area) or at an approved waste disposal facility.

Container Disposal: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or by incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

In Case of Spill: Confine it, avoid contact, isolate area and keep animals and unprotected persons away. If spill is liquid, form dike around spill area and/or absorb spill with absorbent materials, such as sand, cat litter or clay. If spill is dry powder only, sweep material into a suitable container. Place damaged package in a holding container and identify contents. Contact Ensystex IV at 1-866-367-8467 or Chemtrec at 1-800-424-9300 for any assistance.

APPLICATION FOR CONTROL OF SUBTERRANEAN TERMITES

General

PROTHOR SC 0.5, in the form of a dilute insecticidal solution, prevents and controls subterranean termite infestations in and around structures and other items by creating a continuous chemically treated zone (horizontal and/or vertical as needed) between the wood and other cellulose material in a structure and termite colonies in the soil. In order to establish a zone between the wood in the structure and the termites in the soil, adequately disperse the solution of this product in the soil.

To effectively control subterranean termites with this product, the service technician should be familiar with current subterranean termite control practices including trenching, rodding, sub-slab and void injection, soil surface fan spreying and excavated soil treatment. Correct use of these techniques is necessary to effectively control infestations by subterranean termites such as *Coptotermes, Heterotermes and Reticulitermes.* The service technician should consider the biology and behavior of the termite specie(s) to be controlled to determine which control practices to use.

Treatment standards and procedures for subterranean termite control may vary due to regulations, water table level, structure design, soil types, construction practices and other factors. For advice concerning currant control practices with respect to specific local conditions, consult resources in structurel pest control and state cooperative extension and regulatory agencies. Follow all federal, state and local regulations and treatment standards for protection of a structure from subterranean termites. All treatment directions contained in this label may not be necessary to provide adequate protection against termites. In some circumstances, it may be necessary to supplement the use of PROTHOR SC 0.5 with other termiticide products such as termite baits or products approved for direct or injection application to wood to adequately protect the property.

Effective termite control may also include mechanical alteration of the structure. Elimination of leaks or points of moisture accumulation within or on the exterior of the structure that result in an increase in the moisture content of wooden structural components is advised. Removal of non-essential cellulose containing materials that are in contact with the ground under or around the structure can reduce termite foraging in the area.

PROTHOR SC 0.5 is labeled for use against subterranean termites as a 0.05% to 0.10% solution in water. Generally, the 0.05% rate is used for typical control situations. When severe or persistent infestations are occurring, a 0.10% solution may be more appropriate. When difficult or problem ‘s or construction types are encountered, it may be necessary to use 0.10% PROTHOR SC 0.5 d in reduced volumes of water.

..oid contamination of water supplies due to backflow under reduced water system pressure by using anti-backflow equipment or procedures to prevent siphoning of any solution back into a water supply. Do not contaminate cisterns or wells. Do not treat soil that is water saturated or frozen. Do not treat while precipitation is occurring. Do not apply solution to an area or site if the soil at the area or site is in such a state or condition that runoff or movement of the solution from the treated area or site is likely to occur. Structures that contain wells or cisterns within the foundation of the structure can only be treated using the treated backfill method described in the treatment around wells and cisterns section of this label. Consult state and local specifications for recommended distances of wells from treated areas, or if such regulations do not exist, refer to Federal Housing Administration Specifications (H.U.D.) for guidance.

Dilution and Mixing of PROTHOR SC 0.5

Use rates for PROTHOR SC 0.5 are expressed and the solution is mixed according to the percentage (%) concentration it forms when mixed in water. Use the *Mixing Table for PROTHOR SC 0.5* or alternately the formulas below to determine the amount of PROTHOR SC 0.5 to add to any quantity of water.

To mix, measure out the required amount of PROTHOR SC 0.5 according to the *Mixing Table for PROTHOR SC 0.5.* Pour this amount of PROTHOR SC 0.5 into the spray tank as it is being filled with water with the agitator operating.

Mix PROTHOR SC 0.5 to create a use dilution in the following manner:

1. Fill tank 1/4 to 1/3 full.
2. Start pump to begin by-pass agitation and place end of treating tool in tank to allow circulation through hose.
3. Add appropriate amount of PROTHOR SC 0.5.
4. Add remaining amount of water.
5. Let pump run and allow recirculation through the hose for 2 to 3 minutes."

‹or SC may also be mixed into full tanks of water, but substantial agitation is required to ensura ɹmity of the solution.

Mixing Table for PROTHOR SC 0.5

Solution Percentage Concentration Desired	Gallons of Finished Solution Desired	Fluid Ounces of PROTHOR SC 0.5 to add
0.05%	25	27.5
	50	55.0
	100	110.0
0.10%	25	55.0
	50	110.0
	100	220.0

Calculating an Amount of PROTHOR SC 0.5 to Mix

To mix any amount of PROTHOR SC 0.5 determine:

A = Gallons of water into which PROTHOR SC 0.5 will be mixed. Express any partial gallons as decimal fractions (1/2 = .5).

Fluid ounces of PROTHOR SC 0.5 to add to A gallons for 0.05% = A x 1.1

Fluid ounces of PROTHOR SC 0.5 to add to A gallons for 0.10% = A x 2.2

Proportional Injector Mixing Table For PROTHOR SC 0.5

Solution Percentage Concentration Desired	Injector Volume (fluid ounces per gallon)
0.05%	1.10
0.10%	2.20

Application Volume

To provide maximum control and protection against termite infestation, apply the specified volume of the finished water solution containing the specified amount of PROTHOR SC 0.5 as set out below or as otherwise directed in this label.

Prescribed Horizontal Barrier Rate: Unless otherwise directed, horizontal barriers are created by applying a 0.05% to 0.10% solution at a rate of one gallon of solution per 10 square feet.

Prescribed Vertical Barrier Rate: Unless otherwise directed, vertical barriers are created by applying a 0.05% to 0.10% solution at a rate of four gallons of solution per 10 linear feet per foot of depth.

Adjustments to Application Volume

If soil will not accept the labeled application volumes, the volume may be reduced provided there is a corresponding increase in concentration so that the amount of active ingredient applied to the soil remains the same.

Note: Large reductions of application volume reduce the likelihood of obtaining a continuous barrier. Variance is allowed when volume and concentration are consistent with label directed rates and a continuous barrier can still be achieved. When volume is reduced, the spacing of holes created for sub slab injection and soil rodding may need to be reduced to account for decreased dispersion of the solution in the soil.

For example, adjust the amount of solution applied to deliver a horizontal barrier of 10 square feet from 1 gallon to as low as 0.5 gallons and as high as 2 gallons while maintaining the amount of PROTHOR SC 0.5 applied per 10 square feet.

For example, adjust the amount of solution applied to deliver a vertical barrier 10 feet long by one foot deep from 4 gallons to as low as 2 gallons and as high as 8 gallons while maintaining the amount of PROTHOR SC 0.5 applied per 10 linear feet.

PRE-CONSTRUCTION TREATMENT

All Structures

Pre-construction treatment: Do not apply at a lower dosage and/or concentration than specified on this label for applications prior to the installation of the finished grade.

Prior to each application, applicators must notify the general contractor, construction superintendent, or similar responsible party, of the intended termiticide application and intended sites of application and instruct the responsible person to notify construction workers and other individuals to leave the area to be treated during application and until the termiticide is absorbed into the soil.

Effective control of subterranean termites can be accomplished during construction by using a 0.05% solution of PROTHOR SC 0.5 to establish vertical and/or horizontal barriers between the structure and the soil as directed. To meet current termite proofing requirements, follow the procedures in the latest edition of the Housing and Urban Development Minimum Property Standards.

Horizontal Barriers Under Slabs on Ground Including Basements

Create a horizontal barrier on the entire surface of soil or substrate that will be covered by a slab, including, but not limited to, slab floors, garages, carports, basements, porches and entrance platforms by treating the soil or substrate with the solution at the Prescribed Horizontal Barrier Rate.

If the fill under the slab is a coarse material such as washed gravel, make sure that a sutficient enough amount of dilution is applied that the solution reaches the soil beneath the fill.

Apply solution using a coarse spray nozzle. If the slab over the treated area will not be poured on the same day as the application (and there are no foundation walls in place around the treated soil) cover treated soil with a water-proof barrier such as polyethylene sheeting.

Vertical Barriers

Create a vertical barrier along the inside and outside of foundation walls, around piers, plumbing and utility service entrances and other points of possible future termite access and entry by treating the soil at these points at the Prescribed Vertical Barrier Rate. When trenching and rodding into the trench, or trenching alone, it is important that the solution reaches the top of the footing. Rod holes must be spaced so as to achieve a continuous termiticidal barrier, but they should in no cese be more than 12 inches apart. Trenches need not be wider than 6 inches. Mix the solution into the soil as it is being replaced in the trench. Care should be taken to avoid washing soil out from around footings thereby undermining the stability of the structure. An inside vertical barrier may not be required for a monolithic slab.

If distance from final grade to top of footing will be less than four feet, it is permissible to wait until final grade is esteblished to apply the vertical barrier. When treating foundations deeper than 4 feet, apply the termiticide as the backfill is being replaced, or if the construction contractor fails to notify the applicator in time to permit this, treat the foundation to a minimum depth of 4 feet after the backfill has been installed. The applicator must trench and rod into the trench or trench along the foundation walls and around pillars and other foundation elements, at the rate prescribed from grade to a minimum depth of 4 feet. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. However, in no case should a structure be treated below the footing.

Hollow Block Foundations and Voids

Hollow block foundations and voids may be treated at a rate of 2 gallons of solution per 10 linear feet to create a continuous treated zone within the voids at the footing.

POST CONSTRUCTION TREATMENT

All Structures

Do not apply treatment until the identity and location of all wells, radiant heat pipes, water and sewer lines, electrical conduits and sub-slab heating and air conditioning ducts is established. Caution must be taken to avoid puncturing these elements and/or injecting solution into them. All holes in commonly occupied areas into which material has been applied must be plugged. Plugs must be of a non-cellulose material or covered by an impervious, non-cellulose material.

Vertical Barrier Depth: For applications made after the final grade is installed, the applicator must trench and rod into the trench or trench along the foundation walls and around pillars and other foundation elements and treat at the rate prescribed from grade to the top of the footing. When the footing is more than four (4) feet below grade, the applicator must trench and rod into the trench or trench along the foundation walls and treat at the rate prescribed to a minimum depth of four feet. The actual depth of treatment will vary depending on the soil type, degree of compaction, and location of termite activity. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. However, in no case should a structure be treated below the footing.

Structures Containing Concrete Slabs on Ground (Monolithic/Floating/Supported) including Basements

To make an application beneath existing slabs, it may be necessary to drill holes in the slab or adjacent foundation and to apply solution. Holes should be spaced such that when treatment is applied through them, a continuous treated zone is applied beneath the slab.

Vertical Barriers Along Exterior of Foundation Walls: Trench and rod into the trench or trench along the outside of foundation walls and treat at the Prescribed Vertical Barrier Rate to the depth specified under Vertical Barrier Depth. Where physical obstructions such as concrete walkways adjacent to foundation elements or soil type and/or conditions make trenching prohibitive, treatment may be made by rodding alone.

Vertical Barriers Along Interior of Foundation Walls: Vertical barriers may be established on the interior side of foundation walls by sub-slab injection of the solution at the Prescribed Vertical Barrier Rate. Injection openings can be drilled either vertically through the slab along the interior of the foundation wall or horizontally from the exterior through the foundation wall low enough on the wall to allow for the deposition of the solution beneath the slab along the interior side of the foundation wall. Drill holes should be spaced so as to achieve a continuous chemical barrier but in no case farther apart than 12 inches. Special care must be taken to distribute the solution evenly. Vertical barriers may also be established beneath the slab along both sides of interior footing-supported walls, one side of interior partitions and along all cracks and expansion joints and utility service entrances and bath traps.

Horizontal Barriers Beneath Slabs on Ground: Create a horizontal barrier by treating at the Prescribed Horizontal Barrier Rate beneath slabs by either drilling and long rodding from the exterior or by grid pattern drilling and injection vertically through the slab. Long rodding should be used only when grid pattern drilling and injection and horizontal short rodding and injection cannot be used to deliver the sub slab treatment.

Bath Traps: Exposed soil beneath and around areas where plumbing and utility services penetrate the slab should be treated at the rate of 3 gallons of solution per square foot of soil.

Structures Containing Accessible Crawl Spaces

For crawl spaces, including sealed underfloor spaces that serve as heating and air conditioning plenums, apply vertical termiticide barriers at the rate of 4 gallons of solution per 10 linear feet per foot of depth from grade to the top of the footing, or if the footing is more than 4 feet below grade, to a minimum depth of 4 feet. Apply by trenching and rodding into the trench, or trenching. Treat both sides of foundation and around all piers and pipes. Where physical obstructions such as concrete walkways adjacent to foundation elements prevent trenching, treatment may be made by rodding alone. When soil type and/or conditions make trenching prohibitive, rodding may be used. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. Read and follow the mixing and use direction section of the label if situations are encountered where the soil will not accept the full application volume.

1. Rod holes and trenches must not extend below the bottom of the footing.

2. Rod holes must be spaced so as to achieve a continuous termiticide barrier but in no case more than 12 inches apart.

enches must be a minimum of 6 inches deep or to the bottom of the footing, whichever is less, need not be wider than 6 inches. When trenching in sloping (tiered) soil, the trench must be stepped to ensure adequate distribution and to prevent termiticide from running off. The solution must be mixed with the soil as it is replaced in the trench.

4. When treating crawl spaces used as plenums, turn off the air circulation system of the structure until application has been completed and all solution has been absorbed by the soil.

Subterranean termites can be prevented from constructing shelter tubes directly between the crawl space soil surface and overhead crawl space wooden members by the application of an overall treatment of the crawl space soil surface at the Prescribed Horizontal Barrier Rate using a 0.05% to 0.10% solution of PROTHOR SC 0.5.

PROTHOR SC 0.5 can be applied as a general fan spray within crawl spaces directly to swarming and exposed worker termites at the Prescribed Horizontal Barrier Rate using a 0.05% to 0.10% solution of PROTHOR SC 0.5.

Note: Overall treatments (treatments where chemical is applied more than 18 inches from the foundation walls, piers and pipes) should not be applied within a crawl space that serves as a plenum

Structures Containing Inaccessible Crawl Spaces

For inaccessible interior areas, such as areas where there is insufficient clearance between floor joists and ground surfaces to allow operator access, excavate, if possible, and treat according to the instructions for accessible crawl spaces. Otherwise, apply one, or a combination of the following two methods.

1. To establish a horizontal barrier, apply to the soil surface, 1 gallon of solution per 10 square feet overall using a nozzle pressure of less than 25 p.s.i. and a coarse application nozzle (e.g., Delavan Type RD Raindrop, RD-7 or larger, or Spraying Systems Co. 8010LP TeeJet or comparable nozzle). For an area that cannot be reached with the application wand, use one or more extension rods to make the application to the soil. Do not broadcast or power spray with higher pressures.

o establish a horizontal barrier, drill through the foundation wall or through the floor above and t the soil perimeter at a rate of 1 gallon of solution per 10 square feet. Drill spacing must be at intervals not to exceed 16 inches. Many states have smaller intervals, so check state regulations which may apply.

When treating crawl spaces used as plenums, turn off the air circulation system of the structure until application has been completed and all termiticide has been absorbed by the soil.

Note: Overall treatments (treatments where chemical is applied more than 18 inches from the foundation walls, piers and pipes) should not be applied within a crawl space that serves as a plenum.

Masonry Voids

Drill and treat voids in multiple masonry elements of the structure extending from the structure to the soil in order to create a continuous treatment barrier in the area to be treated. Apply at the rate of 2 gallons of solution per 10 linear feet of footing using a nozzle pressure of less than 25 p.s.i. When using this treatment access holes must be drilled below the sill plate and should be as close as possible to the footing as is practical. Treatment of voids in block or rubble foundation walls must be closely examined: Applicators must inspect areas of possible runoff as a precaution against application leakage in the treated areas. Some areas may not be treatable or may require mechanical alteration prior to treatment.

All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site. Do not allow people or pets to contact contaminated areas or to reoccupy the contaminated areas of the structure until the clean-up is completed.

Note: When drilling veneer walls, care should be taken to not drill beyond the depth of the void behind the veneer into another construction layer behind the veneer. It is however permissible to drill through the veneer and into concrete blocks behind the veneer and to treat the veneer and the concrete blocks at the same time.

Note: Not for use in voids insulated with rigid foam.

TREATMENT OF STRUCTURES WITH WELLS AND CISTERNS

Do not contaminate wells or cisterns.

Structures with Wells/Cisterns Inside Foundations

Structures that contain wells or cisterns within the foundation of a structure can only be treated using the following techniques:

Do not treat soil while it is beneath or within the foundation or along the exterior perimeter of a structure that contains a well or cistern. The treated backfill method must be used if soil is removed and treated outside/away from the foundation. The treated backfill technique is described as follows:

a. Trench and remove soil to be treated onto heavy plastic sheeting or similar material or into a wheelbarrow.

b. Treat the soil at the rate of 4 gallons of dilute solution per 10 linear feet per foot of depth of the trench, or 1 gallon per 1.0 cubic feet of soil. See *Mixing Directions for PROTHOR SC 0.5 for Use as a Termiticide* section of the label. Mix thoroughly into the soil taking care to contain the liquid and prevent runoff or spillage.

c. After the treated soil has absorbed the solution, replace the soil into the trench.

Structures with Adjacent Wells/Cisterns and/or Other Water Bodies

Applicators must inspect all structures with nearby water sources such as wells, cisterns, surface ponds, streams, and other bodies of water and evaluate, at a minimum, the treatment recommendations listed below prior to making an application.

1. Prior to treatment, if feasible, expose the water pipe(s) coming from a wall to the structure, if the pipe(s) enter the structure within 3 feet of grade.

2. Prior to treatment, applicators are advised to take precautions to limit the risk of applying the termiticide into subsurface drains that could empty into any bodies of water. These precautions include evaluating whether applicetion of the termiticide to the top of the footer may result in contamination of the subsurface drain. Factors such as depth to the drain system and soil type and degree of compaction should be taken into account in determining the depth of treatment.

3. When appropriate (for example, on the water side of the structure), the treated backfill technique (described above) can also be used to minimize offsite movement of termiticide.

FOAM APPLICATION

PROTHOR SC 0.5, in the form of a foam, can be used to deliver PROTHOR SC 0.5 as a termiticide any time it appears likely this form of delivery will improve the dispersal of PROTHOR SC 0.5 into and within the intended target area. Foam can be particularly useful to deliver PROTHOR SC 0.5 where it either cannot be depended upon to be delivered as just a solution or due to a need to reduce the amount of water used in order to avoid water damage to the target or adjacent areas. In some situations, for example under some slabs, a solution cannot be depended upon to disperse as completely as a foam because of deflection of the liquid stream or some other structural obstacle or defect.

Depending on the circumstances, foam applications of PROTHOR SC 0.5 may be used alone or in combination with liquid solution applications, provided that the cumulative amount of active ingredient per unit of area applied is equivalent to that which would be contained in a 0.05% to 0.10% solution-only application applied to the same area.

Using foam generating equipment, a solution of PROTHOR SC 0.5, ranging in concentration from 0.05% to 0.10%, may be converted into a foam according to the foaming agent and foaming equipment manufacturer's recommendations.

First, form a solution of PROTHOR SC 0.5 of the appropriate percentage concentration and volume. Then add the recommended volume of a foaming agent. Verify that the foaming agent is compatible with PROTHOR SC 0.5.

Applications may be made behind veneers, piers, chimney bases, into rubble foundations, into block voids, structural voids or other similar voids, under slabs, stoops, porches or to the soil in crawlspaces.

RETREATMENT

Retreatments for subterranean termites can only be performed if there is clear evidence of reinfestation or disruption of the barrier due to construction, excavation or landscaping and/or evidence of the breakdown of the termiticide barrier in the soil. These vulnerable or reinfested areas may be retreated in accordance with application techniques described in this product's labeling. The timing and type of these retreatments will vary, depending on factors such as termite pressure, soil types, soil conditions and other factors which may reduce the effectiveness of the barrier. Retreatment may be made as either a spot or complete treatment.

Retreatments in the absence of reinfestation or barrier disruption may be performed five or more years after a complete treatment was last applied to the structure. Such retreatments should be made based on the judgment of the applicator that such retreatment is necessary to ensure the continued protection of the structure from termite attack. In making such judgment, the applicator should take into account the expected useful life of the last treatment administered (based on efficacy testing) and conditions specific to the structure in question that may increase it vulnerability to attack.

Annual retreatment of the structure is prohibited unless there is clear evidence that reinfestation or treated zone disruption has occurred.

APPLICATION IN CONJUNCTION WITH BORATES AND TERMITE BAITS

Spot only applications of PROTHOR SC 0.5 can be used as a supplement to borate treatments and termite baiting system installations that are labeled for stand alone protection against termite attack. Stand alone product is defined as a product that is labeled for the protection of a structure when applied alone without the use of other termite control products. Spot only applications are defined as the use of PROTHOR SC 0.5 according to any of the permitted and applicable post-treatment application techniques contained in this label, alone or in combination, to the extent needed or deemed necessary or useful as an adjunct to the application of a standalone product.

APPLICATION TO PROTECT UNDERGROUND ITEMS FROM SUBTERRANEAN TERMITE ATTACK

To protect components installed underground such as wires, conduits, cables and pipes buried in soil against termite attack, create an envelope of PROTHOR SC 0.5 treated soil around the components along the entire underground length of the component. First, treat soil through which components will be run with 0.05% to 0.10% solution of PROTHOR SC 0.5 at a rate of 2 gallons of solution per 10 linear feet. Install components, laying them on the treated soil. Cover components with untreated soil and then treat this covering soil using the same percent solution at 2 gallons of solution per 10 linear feet.

Underground components to be protected may be located within the foundation of a structure or outside of a structure such as within a utility right of way, for example. Do not treat items that are electrically energized at the time of application. If the soil will not absorb the indicated amount of solution, as little as 1 gallon of 0.10% solution per 10 linear feet can be used. Treat points where services emerge from the ground at a rate of 1 to 2 gallons of solution at the point of emergence.

APPLICATIONS TO PROTECT POLES, POSTS AND OTHER WOODEN ITEMS FROM SUBTERRANEAN TERMITE ATTACK

PROTHOR SC 0.5 can be used to protect the below ground portions of wooden structural components from termites. Form a treated zone around components below ground by vertically rodding the soil around their perimeter to a depth of six inches below their maximum depth of placement in the soil and applying a 0.05% to 0.10% solution of PROTHOR SC 0.5 at a rate of 0.4 gallons of solution per linear foot of perimeter around the component per foot of treated depth. Measure the perimeter of the component six inches from the outside of the component.

APPLICATIONS TO TERMITE CARTON NESTS LOCATED IN ABOVE GROUND WALL VOIDS

Apply a 0.05% to 0.10% solution of PROTHOR SC 0.5 directly into above ground termite carton nests including nests located in wall voids using a directional injector. Apply as a solution or foam under pressure to distribute solution thoroughly throughout the nest. It may be necessary to inject solution at one or more points and at varying depths within the nest to adequately distribute solution within the interior of the nest.

TERIOR APPLICATION FOR ANT CONTROL

.pply a 0.05% to 0.10% solution of PROTHOR SC 0.5 to the exterior of the structure as a general surface, spot, crack and crevice or wall void treatment. Apply at points where ants may enter the structure or crawl and hide including exterior surfaces, around doors and windows, under eaves, attic and foundation vents, utility entrances and cracks in the surface of the structure. Spray solution or foam into voids where ants or their nests are present. Apply a volume of solution sufficient to cover the target surface(s) however avoid excess dripping or runoff from vertical or overhead surfaces.

Treat soil, turf or ground cover (flower, shrub and plant beds) adjacent to the structure where ants are trailing or may find food. Ants tunneling in the soil may be controlled by applying a 0.05% to 0.10% solution of PROTHOR SC 0.5 as a drench or soil injection along the edge of foundations or other hard surfaces such as driveways. Apply in a volume sufficient to treat or cover the soil or foliage.

Inject a 0.05% to 0.10% solution of PROTHOR SC 0.5 in the form of a spray or foam into tree cavities or other parts of trees where ant nests are located.

Do not treat more often than once per month. Do not allow residents or pets into the immediate area during application or allow them to make contact with treated areas until spray has dried.

It is recommended to remove or prune away shrubbery, bushes and tree branches touching the structure. Vegetation touching the structure may offer a route of entry for ants into the structure that allow ants to inhabit the structure without coming in contact with the treatment. If nests are found, direct treatment of nests with PROTHOR SC 0.5 can be made.

Do not use PROTHOR SC 0.5 against native fire ants, imported fire ants, pharaoh ants or harvester ants. Limit applications for control of carpenter ants to treatment of non-wooden parts or surfaces of structures.

ATTENTION

not apply to soil in areas where edible plants may be planted. Do not plant edible plants in soil nas been treated with PROTHOR SC 0.5.

IMPORTANT READ BEFORE USE

NOTICE: Read the entire Directions for Use, Conditions of Sale, Disclaimer of Warranties and Limitations of Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

CONDITIONS OF SALE: The Directions for Use of this product are believed to be adequate and should be followed carefully. However, because of manner of use and other factors beyond the control of Ensystex IV, Inc., it is impossible for Ensystex IV to eliminate all risks associated with the use of this product such as ineffectiveness or unintended consequences. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold Ensystex IV harmless for any claims relating to such factors.

DISCLAIMER OF WARRANTIES: Seller warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the Directions for Use when used in accordance with the Directions for Use under normal conditions of use. ENSYSTEX IV MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE, NOR ANY OTHER EXPRESS OR IMPLIED WARRANTIES WITH RESPECT TO THE SELECTION, PURCHASE, OR USE OF THIS PRODUCT THAT EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. Any warranties, express or implied, having been made are inapplicable if this product has been used contrary to label instructions, under abnormal conditions or under conditions not reasonably foreseeable by (or beyond the control of) seller or Ensystex IV, Inc., and buyer assumes the risk of any such use.

LIMITATIONS OF LIABILITY: To the extent permitted by law, Ensystex IV shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF ENSYSTEX IV AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ENSYSTEX IV, THE REPLACEMENT OF THE PRODUCT.

This Conditions of Sale and Limitation of Warranty and Liability may not be amended by any oral or written agreement.

Revised 11/06

Please read instructions on reverse before completing form. Form Approved. OMB No. 2070-0060. Approval expires 2-28-95

United States
Environmental Protection Agency
Washington, DC 20460

☑ Registration
☐ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number
83293- 83923-G

2. EPA Product Manager
V. Eagle

3. Proposed Classification
☑ None ☐ Restricted

4. Company/Product (Name)
Ensystex IV, Inc. / Prothor SC 0.5

PM#
01

5. Name and Address of Applicant *(Include ZIP Code)*
Ensystex IV, Inc.
c/o Pyxis Regulatory Consulting, Inc.
4110 136th St. NW
Gig Harbor, WA 98332
☐ *Check if this is a new address*

6. **Expedited Reveiw.** In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to:
EPA Reg. No. 432-1362
Product Name Premise 0.5 SC

Section - II

☐ Amendment - Explain below.
☐ Resubmission in response to Agency letter dated _____
☐ Notification - Explain below.
☐ Final printed labels in repsonse to Agency letter dated _____
☑ "Me Too" Application.
☐ Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

This application falls under Category R30 (85: New product – Me-Too, Fast Track) as only product chemistry data are being submitted/ bridged and the cite-all option under the selective method is being used to support product specific acute toxicity and efficacy data requirements. In addition, the technical source of active ingredient is based on a registered source of supply. The fee due is $1050 and the decision timeline is 3 months. Please email or fax the fee for service invoice to: fees@PyxisRC.com or 253-853-5516.

Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging	Unit Packaging	Water Soluble Packaging	2. Type of Container
☐ Yes ☑ No	☐ Yes ☑ No	☐ Yes ☑ No	☐ Metal ☑ Plastic ☐ Glass ☐ Paper ☐ Other (Specify)
* *Certification must be submitted*	If "Yes" Unit Packaging wgt. / No. per container	If "Yes" Package wgt / No. per container	

3. Location of Net Contents Information
☐ Label ☑ Container

4. Size(s) Retail Container
330 oz. (2.58 gallons)

5. Location of Label Directions
☐ On Label
☑ On Labeling accompanying product

6. Manner in Which Label is Affixed to Product
☑ Lithograph Paper glued Stenciled
☐ Other _____

Section - IV

1. Contact Point *(Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)*

Name	Title	Telephone No. (Include Area Code)
Michael Kellogg	Agent	(253) 853-7369

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowlingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

6. Date Application Received
(Stamped)

2. Signature
Michael Kellogg

3. Title
Agent

4. Typed Name
Michael Kellogg

5. Date
11/13/06

EPA Form 8570-1 (Rev. 3-94) Previous editions are obsolete. White - EPA File Copy (original) Yellow - Applicant Copy

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

CONFIDENTIAL BUSINESS INFORMATION REDACTED

November 13, 2006

COURIER DELIVERY

Venus Eagle (PM 01)
Document Processing Desk (REGFEE)
Office of Pesticide Programs
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202-4501

RE: Ensystex IV, Inc. – Prothor SC 0.5 (EPA Reg. No. 83923-)
Application for New Pesticide Registration

Dear Ms. Eagle,

On behalf of Ensystex IV, Inc. we are submitting an application for registration of Prothor SC 0.5, an end-use product containing imidacloprid as the active ingredient. In support of this application, we submit the following documents:

1. Copy of cover letter with Confidential Business Information redacted
2. Application for Registration (EPA Form 8570-1)
3. Confidential Statement of Formula
4. Formulators Exemption Statement (EPA Form 8570-27)
5. Five (5) copies of the proposed labeling
6. Certification with Respect to Citation of Data (EPA Form 8570-34)
7. Agency Internal Use Copy of the Data Matrix (EPA Form 8570-35)
8. Public File Copy of the Data Matrix (EPA Form 8570-35)
9. Letter of Authorization
10. Product Specific Data:

Volume 1	830.1550, 830.1600, 830.1650, 830.1670, 830.1750, 830.1800	Kellogg, M. Product Identity and Composition, Description of the Materials Used, Description of the Formulation Process, Discussion of the Formation of Impurities, Certified Limits, and Analytical Methods to Verify Certified Limits for Prothor SC 0.5.
Volume 2	830.6303, 830.6314, 830.6317, 830.6320, 830.7000, 830.7100, 830.7300	Kellogg, M. Request to Bridge Physical/Chemical Characteristics Data to Support the Registration of Prothor SC 0.5.
Volume 3	830.6302, 830.6304, 830.6313, 830.6315, 830.6316, 830.6319, 830.6321, 830.7050, 830.7200, 830.7220, 830.7370, 830.7550-830.7570, 830.7840-	Kellogg, M. Waiver Request for Certain Data Requirements for Prothor SC 0.5.

	830.7860, 830.7950	

[redacted]

Ensystex IV, Inc. believes its product, Prothor SC 0.5, is substantially similar to a currently registered product (EPA Reg. No. 432-1362). Ensystex IV, Inc. believes this application falls under Category R30 (85: New product – Me-Too, Fast Track) as only product chemistry data are being submitted/bridged to support the application for registration and the cite-all option under the selective method is being used to support product specific acute toxicity and efficacy data requirements. In addition, the technical source of active ingredient is based on a registered source of supply and therefore, Prothor SC 0.5 qualifies for Formulators Exemption for imidacloprid generic data requirements.

We trust you will find this application complete. However, please feel free to contact me if you have any questions or need any additional information.

Sincerely,

Michael Kellogg

Enclosures

cc: David Nimocks; Ensystex IV, Inc.

Form approved. OMB No. 2070-0060, 2070-0057, 2070-0107, 2070-0122, 2070-0164.

EPA

United States
Environmental Protection Agency
Washington, DC 20460

Formulator's Exemption Statement

(40 CFR 152.85)

Applicant's Name and Address	EPA File Symbol/Registration Number
Ensystex IV, Inc. 2709 Breezewood Avenue Fayetteville, NC 28303	83293-
	Product Name Prothor SC 0.5
	Date of Confidential Statement of Formula *(EPA Form 8570-4)* 11/09/2006

As an authorized representative of the applicant for registration of the product identified above, I certify that:

(1) This product contains the following active ingredient(s):

Imidacloprid

(2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient which is registered under FIFRA Section 3, is purchased by us from another person and meets the requirements of 40 CFR section 158.50(e)(2) or (3).

(3) Indicate by checking (A) or (B) below which paragraph applies:

☑ (A) An accurate Confidential Statement of Formula *(EPA FORM 8570-4)* for the above identified product is attached to this statement. That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).

OR

☐ (B) The Confidential Statement of Formula (CSF)(EPA Form 8570-4) referenced above and on file with the EPA is complete, current, an accurate and contains the information required on the current CSF.

(4) The following active ingredients in this product qualify for the formulator's exemption.

Source

Active Ingredient	Product Name	Registration Number
Imidacloprid	[redacted]	

Signature	Name and Title	Date
Michael D Kellogg	Michael Kellogg / Agent	11/13/06

EPA Form 8570-17 (Rev. 06-2004)

Copy 1 – EPA
Copy 2 - Applicant copy

Product ingredient source information may be entitled to confidential treatment

Form Approved OMB No. 2070-0060

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

DATA MATRIX

Date December 5, 2006	EPA Reg No./File Symbol 83923-G	Page 1 of 7
Applicant's/Registrant's Name & Address Ensystex IV, Inc. 2709 Breezewood Avenue Fayetteville, NC 28303	Product Prothor SC 0.5	

Ingredient Imidacloprid

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Product Specific Data Requirements					
830.1550	Product Identity and Composition	46988001	Ensystex IV, Inc.	OWN	
830.1600	Description of Materials Used to Produce the Product	46988001	Ensystex IV, Inc.	OWN	
830.1620	Description of Production Process				Not required[1]
830.1650	Description of Formulation Process	46988001	Ensystex IV, Inc.	OWN	
830.1670	Discussion of Formation of Impurities	46988001	Ensystex IV, Inc.	OWN	
830.1700	Preliminary Analysis				Not required[2]
830.1750	Certified Limits	46988001	Ensystex IV, Inc.	OWN	
830.1800	Enforcement Analytical Method	46988001	Ensystex IV, Inc.	OWN	
830.6302	Color				Not required[3]
830.6303	Physical State	Volume 1	Ensystex IV, Inc.	OWN	
830.6304	Odor				Not required[3]
830.6313	Stability to Normal and Elevated Temperatures, Metals, and Metal Ions				Not required[3]
830.6314	Oxidation/Reduction: Chemical Incompatibility	Volume 1	Ensystex IV, Inc.	OWN	
830.6315	Flammability				Not required[4]
830.6316	Explodability				Not required[5]

Signature	Name and Title	Date
Michael Kellogg	Michael Kellogg, Consultant	12/5/06

EPA Form 8570-35 (9-97) Electronic and Paper versions available. Submit only Paper version.

Agency Internal Use Copy

Form Approved OMB No. 2070-0060

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

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DATA MATRIX

Date December 5, 2006	EPA Reg No./File Symbol 83923-G	Page 2 of 7
Applicant's/Registrant's Name & Address Ensystex IV, Inc. 2709 Breezewood Avenue Fayetteville, NC 28303	Product Prothor SC 0.5	

Ingredient Imidacloprid

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.6317	Storage Stability				PRN 92-5[6]
830.6319	Miscibility				Not required[7]
830.6320	Corrosion Characteristics				See endnote[6]
830.6321	Dielectric Breakdown Voltage				Not required[8]
830.7000	pH	Volume 1	Ensystex IV, Inc.	OWN	
830.7050	UV/Visible Absorption				Not required[3]
830.7100	Viscosity	Volume 1	Ensystex IV, Inc.	OWN	
830.7200	Melting Point/Melting Range				Not required[3]
830.7220	Boiling Point/Boiling Range				Not required[3]
830.7300	Density/Relative Density/Bulk Density	Volume 1	Ensystex IV, Inc.	OWN	
830.7370	Dissociation Constants in Water				Not required[3]
830.7550	Partition Coefficient (n-octanol/water), Shake Flask Method				Not required[3]
830.7560	Partition Coefficient (n-octanol/water), Generator Column Method				Not required[3]
830.7570	Partition Coefficient (n-octanol/water), Estimation by Liquid Chromatography				Not required[3]

Signature	Name and Title	Date
Michael Kellogg	Michael Kellogg, Consultant	12/5/06

Form Approved OMB No. 2070-0060

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

DATA MATRIX

Date December 5, 2006	EPA Reg No./File Symbol 83923-G	Page 3 of 7
Applicant's/Registrant's Name & Address Ensystex IV, Inc. 2709 Breezewood Avenue Fayetteville, NC 28303	Product Prothor SC 0.5	

Ingredient Imidacloprid

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.7840	Water Solubility: Column Elution Method; Shake Flask Method				Not required[3]
830.7860	Water Solubility, Generator Column Method				Not required[3]
830.7950	Vapor Pressure				Not required[3]
Product Specific Data Requirements – Acute Toxicity					
870.1100	Acute Oral Toxicity: Rat	Cite-All		PAY	
870.1200	Acute Dermal Toxicity: Rat	Cite-All		PAY	
870.1300	Acute Inhalation Toxicity: Rat	Cite-All		PAY	
870.2400	Primary Eye Irritation: Rabbit	Cite-All		PAY	
870.2500	Primary Dermal Irritation	Cite-All		PAY	
870.2600	Dermal Sensitization	Cite-All		PAY	
Product Specific Data Requirements - Efficacy					
810.3500	Premises Treatments	Cite-All		PAY	
810.3600	Structural Treatments	Cite-All		PAY	

Signature	Name and Title	Date
Michael Kellogg	Michael Kellogg, Consultant	12/5/06

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DATA MATRIX

Date December 5, 2006	EPA Reg No./File Symbol 83923-G	Page 4 of 7
Applicant's/Registrant's Name & Address Ensystex IV, Inc. 2709 Breezewood Avenue Fayetteville, NC 28303	Product Prothor SC 0.5	

Ingredient Imidacloprid

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Prothor SC 0.5 Product Specific Acute Toxicity and Efficacy Data Requirements					
Ensystex IV, Inc. is using the cite-all option under the selective method to satisfy acute toxicity and efficacy data requirements. Ensystex IV, Inc. will make offers-to-pay to the following companies on the data submitters list of September 30, 2006.					
Imidacloprid Product Specific Data Requirements					
Imidacloprid Product Specific Data Requirements	Cite-All		Syngenta Crop Protection, Inc.	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Nufarm Americas Inc.	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Bayer CropScience LP	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Bayer Environmental Science	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Bayer Corporation	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Gustafson LLC	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Chemical Specialties Inc.	PAY	

Signature	Name and Title	Date
Michael Kellogg	Michael Kellogg, Consultant	12/5/06

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DATA MATRIX

Date December 5, 2006	EPA Reg No./File Symbol 83923-G	Page 5 of 7
Applicant's/Registrant's Name & Address Ensystex IV, Inc. 2709 Breezewood Avenue Fayetteville, NC 28303	Product Prothor SC 0.5	

Ingredient Imidacloprid

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Imidacloprid Product Specific Data Requirements	Cite-All		Bayer Healthcare LLC	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Mitsui Chemicals America, Inc.	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Lanxess Corporation	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Albaugh, Inc.	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Spray Drift Task Force	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Dow AgroSciences LLC	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Arbor Systems, LLC	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Pet Logic, LLC	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Nufarm, Inc.	PAY	

Signature	Name and Title	Date
Michael Kellogg	Michael Kellogg, Consultant	12/5/06

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DATA MATRIX

Date December 5, 2006	EPA Reg No./File Symbol 83923-G	Page 6 of 7
Applicant's/Registrant's Name & Address Ensystex IV, Inc. 2709 Breezewood Avenue Fayetteville, NC 28303	Product Prothor SC 0.5	

Ingredient Imidacloprid

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Imidacloprid Product Specific Data Requirements	Cite-All		Outdoor Residential Exposure Task Force	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Agricultural Reentry Task Force	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Bayer Advanced	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Zelam Ltd.	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Arborjet	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Residential Exposure Joint Venture (REJV)	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Agricultural Handlers Exposure Task Force	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Arch Treatment Technologies, Inc.	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Etigra, LLC	PAY	

Signature	Name and Title	Date
Michael Kellogg	Michael Kellogg, Consultant	12/5/06

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DATA MATRIX

Date December 5, 2006	EPA Reg No./File Symbol 83923-G	Page 7 of 7
Applicant's/Registrant's Name & Address Ensystex IV, Inc. 2709 Breezewood Avenue Fayetteville, NC 28303	Product Prothor SC 0.5	

Ingredient Imidacloprid

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Imidacloprid Product Specific Data Requirements	Cite-All		Interregional Research Project No. 4	PAY	
Imidacloprid Generic Data Requirements					
Ensystex IV, Inc. qualifies for Formulator's Exemption for imidacloprid generic data requirements.					

Signature	Name and Title	Date
Michael Kellogg	Michael Kellogg, Consultant	12/5/06

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Endnotes for Data Matrix for Prothor SC 0.5

[1] **830.1620** - Per OPPTS 830.1000, these data are not required for the registration of an end-use product. See 830.1650 for formulation process information.

[2] **830.1700** – This product does not consist solely of the technical grade active ingredient (TGAI) and is not produced by an integrated system, therefore, per OPPTS 830.1700, these data are not required.

[3] **830.6302, 830.6304, 830.6313, 830.7050, 830.7200, 830.7220, 830.7370, 830.7550, 830.7560, 830.7570, 830.7840, 830.7860 and 830.7950** – Per OPPTS 830.1000, these data are not required for the registration of an end-use product.

[4] **830.6315** - This product is not a combustible liquid; therefore these data are not applicable to this end-use product. Please refer to the Confidential Statement of Formula for additional information on the composition of Prothor SC 0.5.

[5] **830.6316** – This product does not have explosive characteristics; therefore these data are not required. Please refer to the Confidential Statement of Formula for additional information on the composition of Prothor SC 0.5.

[6] **830.6317, 830.6320** – Ensystex IV, Inc. is currently conducting storage stability and corrosion characteristic studies to satisfy guidelines 830.6317 and 830.6320, respectively for their Prothor SC 0.5 product. Per PR Notice 92-5, storage stability data are not required to be submitted unless specifically requested by the Agency. OPPTS 830.6317 and 830.6320 guidelines allow the corrosion characteristics study and storage stability study to be conducted simultaneously. Ensystex IV, Inc. will submit these data upon completion. As these studies take over a year to complete, Ensystex IV, Inc. requests that a conditional registration for Prothor SC 0.5 be granted on the submission of these data.

[7] **830.6319** – Prothor SC 0.5 is a suspension concentrate formulation and not an emulsifiable concentrate. In addition, the proposed label recommends dilution of Prothor SC 0.5 with water, not oil; therefore, these data are not applicable nor are these data required.

[8] **830.6321** – This product is not proposed for use around electrical equipment. Therefore, these data are not applicable nor are these data required.

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Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number	EPA Registration Number/File Symbol
Ensystex IV, Inc.; 2709 Breezewood Ave.; Fayetteville, NC 28302; (800) 753-2847	83923- 3
Active Ingredient(s) and/or representative test compound(s) Imidacloprid	Date November 13, 2006
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) Terrestrial Nonfood, Domestic Outdoor	Product Name Prothor SC 0.5

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

☐ I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

☑ I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).

SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☑ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses .

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (I) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature	Date	Typed or Printed Name and Title
Michael Kellogg	11/13/06	Michael Kellogg; Agent

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DATA MATRIX

Date November 13, 2006	EPA Reg No./File Symbol 83923-	Page 1 of 7
Applicant's/Registrant's Name & Address Ensystex IV, Inc. 2709 Breezewood Avenue Fayetteville, NC 28303	Product Prothor SC 0.5	

Ingredient Imidacloprid

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Product Specific Data Requirements					
830.1550	Product Identity and Composition	Volume 1	Ensystex IV, Inc.	OWN	
830.1600	Description of Materials Used to Produce the Product	Volume 1	Ensystex IV, Inc.	OWN	
830.1620	Description of Production Process				Not required[1]
830.1650	Description of Formulation Process	Volume 1	Ensystex IV, Inc.	OWN	
830.1670	Discussion of Formation of Impurities	Volume 1	Ensystex IV, Inc.	OWN	
830.1700	Preliminary Analysis				Not required[2]
830.1750	Certified Limits	Volume 1	Ensystex IV, Inc.	OWN	
830.1800	Enforcement Analytical Method	Volume 1	Ensystex IV, Inc.	OWN	
830.6302	Color				Not required[3]
830.6303	Physical State		Ensystex IV, Inc.	OWN	See endnote[4]
830.6304	Odor				Not required[3]
830.6313	Stability to Normal and Elevated Temperatures, Metals, and Metal Ions				Not required[3]
830.6314	Oxidation/Reduction: Chemical Incompatibility		Ensystex IV, Inc.	OWN	See endnote[4]
830.6315	Flammability				Not required[5]
830.6316	Explodability				Not required[6]

Signature	Name and Title	Date
Michael Kellogg	Michael Kellogg, Consultant	11/13/06

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DATA MATRIX

Date November 13, 2006	EPA Reg No./File Symbol 83923-	Page 2 of 7
Applicant's/Registrant's Name & Address Ensystex IV, Inc. 2709 Breezewood Avenue Fayetteville, NC 28303	Product Prothor SC 0.5	

Ingredient Imidacloprid

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.6317	Storage Stability				PRN 92-5[7]
830.6319	Miscibility				Not required[8]
830.6320	Corrosion Characteristics				See endnote[7]
830.6321	Dielectric Breakdown Voltage				Not required[9]
830.7000	pH		Ensystex IV, Inc.	OWN	See endnote[4]
830.7050	UV/Visible Absorption				Not required[3]
830.7100	Viscosity		Ensystex IV, Inc.	OWN	See endnote[4]
830.7200	Melting Point/Melting Range				Not required[3]
830.7220	Boiling Point/Boiling Range				Not required[3]
830.7300	Density/Relative Density/Bulk Density		Ensystex IV, Inc.	OWN	See endnote[4]
830.7370	Dissociation Constants in Water				Not required[3]
830.7550	Partition Coefficient (n-octanol/water), Shake Flask Method				Not required[3]
830.7560	Partition Coefficient (n-octanol/water), Generator Column Method				Not required[3]
830.7570	Partition Coefficient (n-octanol/water), Estimation by Liquid Chromatography				Not required[3]

Signature	Name and Title	Date
	Michael Kellogg, Consultant	11/13/06

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DATA MATRIX

Date November 13, 2006	EPA Reg No./File Symbol 83923-	Page 3 of 7
Applicant's/Registrant's Name & Address Ensystex IV, Inc. 2709 Breezewood Avenue Fayetteville, NC 28303	Product Prothor SC 0.5	

Ingredient Imidacloprid

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.7840	Water Solubility: Column Elution Method; Shake Flask Method				Not required[3]
830.7860	Water Solubility, Generator Column Method				Not required[3]
830.7950	Vapor Pressure				Not required[3]
Product Specific Data Requirements – Acute Toxicity					
870.1100	Acute Oral Toxicity: Rat	Cite-All		PAY	
870.1200	Acute Dermal Toxicity: Rat	Cite-All		PAY	
870.1300	Acute Inhalation Toxicity: Rat	Cite-All		PAY	
870.2400	Primary Eye Irritation: Rabbit	Cite-All		PAY	
870.2500	Primary Dermal Irritation	Cite-All		PAY	
870.2600	Dermal Sensitization	Cite-All		PAY	
Product Specific Data Requirements - Efficacy					
810.3500	Premises Treatments	Cite-All		PAY	
810.3600	Structural Treatments	Cite-All		PAY	

Signature	Name and Title	Date
Michael Kellogg	Michael Kellogg, Consultant	11/13/06

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DATA MATRIX

Date November 13, 2006	EPA Reg No./File Symbol 83923-	Page 4 of 7
Applicant's/Registrant's Name & Address Ensystex IV, Inc. 2709 Breezewood Avenue Fayetteville, NC 28303	Product Prothor SC 0.5	

Ingredient Imidacloprid

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Prothor SC 0.5 Product Specific Acute Toxicity and Efficacy Data Requirements					
Ensystex IV, Inc. is using the cite-all option under the selective method to satisfy acute toxicity and efficacy data requirements. Ensystex IV, Inc. will make offers-to-pay to the following companies on the data submitters list of September 30, 2006.					
Imidacloprid Product Specific Data Requirements					
Imidacloprid Product Specific Data Requirements	Cite-All		Syngenta Crop Protection, Inc.	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Nufarm Americas Inc.	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Bayer CropScience LP	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Bayer Environmental Science	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Bayer Corporation	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Gustafson LLC	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Chemical Specialties Inc.	PAY	

Signature	Name and Title	Date
Michael Kellogg	Michael Kellogg, Consultant	11/13/06

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Date November 13, 2006	EPA Reg No./File Symbol 83923-	Page 5 of 7
Applicant's/Registrant's Name & Address Ensystex IV, Inc. 2709 Breezewood Avenue Fayetteville, NC 28303	Product Prothor SC 0.5	

Ingredient Imidacloprid

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Imidacloprid Product Specific Data Requirements	Cite-All		Bayer Healthcare LLC	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Mitsui Chemicals America, Inc.	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Lanxess Corporation	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Albaugh, Inc.	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Spray Drift Task Force	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Dow AgroSciences LLC	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Arbor Systems, LLC	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Pet Logic, LLC	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Nufarm, Inc.	PAY	

Signature	Name and Title	Date
Michael Kellogg	Michael Kellogg, Consultant	11/13/06

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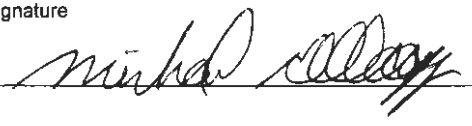
DATA MATRIX

Date November 13, 2006	EPA Reg No./File Symbol 83923-	
Applicant's/Registrant's Name & Address Ensystex IV, Inc. 2709 Breezewood Avenue Fayetteville, NC 28303	Product Prothor SC 0.5	

Ingredient Imidacloprid

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Imidacloprid Product Specific Data Requirements	Cite-All		Outdoor Residential Exposure Task Force	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Agricultural Reentry Task Force	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Bayer Advanced	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Zelam Ltd.	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Arborjet	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Residential Exposure Joint Venture (REJV)	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Agricultural Handlers Exposure Task Force	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Arch Treatment Technologies, Inc.	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Etigra, LLC	PAY	

Signature	Name and Title	Date
	Michael Kellogg, Consultant	11/13/06

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Applicant's/Registrant's Name & Address Ensystex IV, Inc. 2709 Breezewood Avenue Fayetteville, NC 28303	Product Prothor SC 0.5	

Ingredient Imidacloprid

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Imidacloprid Product Specific Data Requirements	Cite-All		Interregional Research Project No. 4	PAY	
Imidacloprid Generic Data Requirements					
Ensystex IV, Inc. qualifies for Formulator's Exemption for imidacloprid generic data requirements.					

Signature	Name and Title	Date
Michael Kellogg	Michael Kellogg, Consultant	11/13/06

Endnotes for Data Matrix for Prothor SC 0.5

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[1] **830.1620** - Per OPPTS 830.1000, these data are not required for the registration of an end-use product. See 830.1650 for formulation process information.

[2] **830.1700** – This product does not consist solely of the technical grade active ingredient (TGAI) and is not produced by an integrated system, therefore, per OPPTS 830.1700, these data are not required.

[3] **830.6302, 830.6304, 830.6313, 830.7050, 830.7200, 830.7220, 830.7370, 830.7550, 830.7560, 830.7570, 830.7840, 830.7860 and 830.7950** – Per OPPTS 830.1000, these data are not required for the registration of an end-use product.

[4] **830.6303, 830.6314, 830.7000, 830.7100, and 830.7300** – Ensystex IV, Inc. requests that data submitted to support the registration of their Prothor SC 2 product (EPA File Symbol No. Pending) be used to support this registration, Prothor SC 0.5. Please refer to Volume 2 (MRID No. Pending) of the Prothor SC 2 application for registration submission dated November 13, 2006.

[5] **830.6315** - This product is not a combustible liquid; therefore these data are not applicable to this end-use product. Please refer to the Confidential Statement of Formula for additional information on the composition of Prothor SC 0.5.

[6] **830.6316** – This product does not have explosive characteristics; therefore these data are not required. Please refer to the Confidential Statement of Formula for additional information on the composition of Prothor SC 0.5.

[7] **830.6317, 830.6320** – Ensystex IV, Inc. is currently conducting storage stability and corrosion characteristic studies to satisfy guidelines 830.6317 and 830.6320, respectively for their Prothor SC 2 product. **Ensystex IV, Inc. requests that data being generated to support the registration of their Prothor SC 2 product be used to support this registration, Prothor SC 0.5.** Per PR Notice 92-5, storage stability data are not required to be submitted unless specifically requested by the Agency. OPPTS 830.6317 and 830.6320 guidelines allow the corrosion characteristics study and storage stability study to be conducted simultaneously. Ensystex IV, Inc. will submit these data upon completion. As these studies take over a year to complete, Ensystex IV, Inc. requests that a conditional registration for Prothor SC 0.5 be granted on the submission data for Prothor SC 2.

[8] **830.6319** – Prothor SC 0.5 is a suspension concentrate formulation and not an emulsifiable concentrate. In addition, the proposed label recommends dilution of Prothor SC 0.5 with water, not oil; therefore, these data are not applicable nor are these data required.

[9] **830.6321** – This product is not proposed for use around electrical equipment. Therefore, these data are not applicable nor are these data required.

ENSYSTEX III, Inc.

2703 Breezewood Ave., P. O. Box 2587, Fayetteville, NC 28302-2587 USA
Telephone - 1-910-484-6163 x 203 Fax - 1-910-484-3378 Email david@ensystex.com

November 2, 2005

To Whom It May Concern:

Re: Letter of Authorization

Dear Sir or Madam:

Please let this letter serve to confirm that Pyxis Regulatory Consulting, Inc. is authorized to act as agent for Ensytex III, Inc. (EPA Company Number pending), before the U.S. Environmental Protection Agency and state governmental agencies in all matters regarding our pesticide registrations pursuant to the Federal Insecticide, Fungicide and Rodenticide Act ("FIFRA"), 7 U.S.C. § 136 et seq. and state law.

If you have any questions, please do not hesitate to contact me.

Sincerely,

David Nimocks
Chairman

cc: Pyxis Regulatory Consulting, Inc.

Notary

Norma D. Stackley, Notary Public
My commission expires 4-21-06

NORMA D. STACKLEY NOTARY PUBLIC CUMBERLAND CO., N.C.

INERT STATUS FORM

Reviewer Name: Alganesh Debesai			Request date: 8/14/2012
Tel: 703-308-8353	RD/IIAB	CUBE: S-7954	MAIL CODE: 7505P

A. COMMENTS:

See comments under Ingredient No. 1

B. PESTICIDE PRODUCT INFORMATION:

Receipt Number: S-921785	Date on CSF: 8/9/12	Food-Use Pesticide: [ ] Yes [x]No
EPA Reg. No/File Symbol: 83923-3	Formulation: Alternate# 1 & 2	
Product Name: Prothor SC 0.5		

C. INGREDIENT INFORMATION:

Ingredient No.1

	Tolerance Exemption(s)[1]					
	910	920	930	940	950	960
Chem. Name:						
Trade Name: [redacted]						
CAS Reg. No.: Proprietary Blend						
Comments: Mixture/Trade name not in the Agency database. Need full compositional information from the manufacturer which includes all CAS Reg. Nos., %w/w (add up to a total of 100%) , and chemical names for all ingredients in the mixture.						

Ingredient No. 2

Chem. Name:						
Trade Name:						
CAS Reg. No.:						
Comments:						

Ingredient No. 3

Chem. Name:						
Trade Name:						
CAS Reg. No.:						

Completed By: Alganesh Debesai Date Completed: 8/28/12

[1] *Language from the Code of Federal Regulations (40 CFR 180, subpart D):*
40 CFR 180.910: Inert ingredients used pre- and post-harvest; 40 CFR 180.920: Inert ingredients used pre-harvest; 40 CFR 180.930: Inert ingredients applied to animals; 40 CFR 180.940: Tolerance exemptions for active and inert ingredients for use in antimicrobial formulations; 40 CFR 180.950: Tolerance exemptions for minimal risk active and inert ingredients; and 40 CFR 180.960: Polymers.

Pages 97-122 - *Confidential Statements of Formula may be entitled to confidential treatment*